DRAFT/PROPOSED CAAPP PERMIT
10/31/2014

Attention:

Color Communications, Inc.
Attn: Steve Winter
4000 West Fillmore Street
Chicago, Illinois 60624

State of Illinois

CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT

Source:

Color Communications, Inc.
4000 West Fillmore Street
Chicago, Illinois 60624

I.D. No.: 031600BGU
Permit No.: 95090040

Permitting Authority:

Illinois Environmental Protection Agency
Bureau of Air, Permit Section
217/785-1705

CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT

Type of Application:	Renewal
Purpose of Application:	Renew Existing CAAPP Permit for 5 Years
ID No.:	031600BGU
Permit No.:	95090040
Statement of Basis No.:	95090040
Date Application Received:	December 10, 2009
Date Issued:	TBD
Expiration Date:	5 Years from Date Issued
Renewal Submittal Date:	9 Months Prior to Expiration Date
Source Name:	Color Communications, Inc.
Address:	4000 West Fillmore Street
City:	Chicago
County:	Cook
ZIP Code:	60624

This permit is hereby granted to the above-designated source authorizing operation in accordance with this CAAPP permit, pursuant to the above referenced application. This source is subject to the conditions contained herein. For further information on the source see Section 1 and for further discussion on the effectiveness of this permit see Condition 2.3(g).

If you have any questions concerning this permit, please contact Lisa Tossi at 217/785-1705.

Raymond E. Pilapil
Acting Manager, Permit Section
Division of Air Pollution Control

REP:MTR:LT:jws

cc: IEPA, Permit Section
IEPA, FOS, Region 1
Lotus Notes Database

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Section 1 - Source Information

1. Addresses

Source

Color Communications, Inc.
4000 West Fillmore Street
Chicago, Illinois 60624

Owner

Color Communications, Inc.
4000 West Fillmore Street
Chicago, Illinois 60624

Operator

Color Communications, Inc.
4000 West Fillmore Street
Chicago, Illinois 60624

Permittee

The Owner or Operator of the source as identified in this table.

2. Contacts

Certified Officials

The source shall submit an Administrative Permit Amendment for any change in the Certified Officials, pursuant to Section 39.5(13) of the Act.

	Name	*Title*
Responsible Official	Steve Winter	President
	Thomas Connerty	VP Finance & Administration, Chief Financial Officer
Delegated Authority	No other individuals have been authorized by the IEPA.	N/A

Other Contacts

	Name	*Phone No.*	*Email*
Source Contact	Elizabeth Santana	773-475-2579	N/A
Technical Contact	Timothy Kinsley	630-993-2143	N/A
Correspondence	Steve Winter	773-638-1400	N/A
Billing	Erendira Santillan	773-475-2479	N/A

3. Single Source

The source identified in Condition 1.1 above shall be defined to include all the following additional source(s):

I.D. No.	*Permit No.*	*Single Source Name and Address*
N/A	N/A	N/A

Section 2 – General Permit Requirements

1. Prohibitions

a. It shall be unlawful for any person to violate any terms or conditions of this permit issued under Section 39.5 of the Act, to operate the CAAPP source except in compliance with this permit issued by the IEPA under Section 39.5 of the Act or to violate any other applicable requirements. All terms and conditions of this permit issued under Section 39.5 of the Act are enforceable by USEPA and citizens under the Clean Air Act, except those, if any, that are specifically designated as not being federally enforceable in this permit pursuant to Section 39.5(7)(m) of the Act. [Section 39.5(6)(a) of the Act]

b. After the applicable CAAPP permit or renewal application submittal date, as specified in Section 39.5(5) of the Act, the source shall not operate this CAAPP source without a CAAPP permit unless the complete CAAPP permit or renewal application for such source has been timely submitted to the IEPA. [Section 39.5(6)(b) of the Act]

c. No Owner or Operator of the CAAPP source shall cause or threaten or allow the continued operation of an emission source during malfunction or breakdown of the emission source or related air pollution control equipment if such operation would cause a violation of the standards or limitations applicable to the source, unless this CAAPP permit granted to the source provides for such operation consistent with the Act and applicable Illinois Pollution Control Board regulations. [Section 39.5(6)(c) of the Act]

d. Pursuant to Section 39.5(7)(g) of the Act, emissions from the source are not allowed to exceed any allowances that the source lawfully holds under Title IV of the Clean Air Act or the regulations promulgated thereunder, consistent with Section 39.5(17) of the Act and applicable requirements, if any.

2. Emergency Provisions

Pursuant to Section 39.5(7)(k) of the Act, the Owner or Operator of the CAAPP source may provide an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations under this CAAPP permit if the following conditions are met through properly signed, contemporaneous operating logs, or other relevant evidence:

a. i. An emergency occurred and the source can identify the cause(s) of the emergency.

ii. The source was at the time being properly operated.

iii. The source submitted notice of the emergency to the IEPA within 2 working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

iv. During the period of the emergency the source took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or requirements in this permit.

b. For purposes of Section 39.5(7)(k) of the Act, “emergency” means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, such as an act of God, that requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under this permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operation error.

c. In any enforcement proceeding, the source seeking to establish the occurrence of an emergency has the burden of proof. This provision is in addition to any emergency or

upset provision contained in any applicable requirement. This provision does not relieve the source of any reporting obligations under existing federal or state laws or regulations.

3. General Provisions

a. Duty to Comply;

The source must comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the CAA and the Act, and is grounds for any or all of the following: enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. [Section 39.5(7)(o)(i) of the Act]

b. Need to Halt or Reduce Activity is not a Defense

It shall not be a defense for the source in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. [Section 39.5(7)(o)(ii) of the Act]

c. Duty to Maintain Equipment

The source shall maintain all equipment covered under this permit in such a manner that the performance or operation of such equipment shall not cause a violation of applicable requirements. [Section 39.5(7)(a) of the Act]

d. Disposal Operations

The source shall be operated in such a manner that the disposal of air contaminants collected by the equipment operations, or activities shall not cause a violation of the Act or regulations promulgated there under. [Section 39.5(7)(a) of the Act]

e. Duty to Pay Fees

i. The source must pay fees to the IEPA consistent with the fee schedule approved pursuant to Section 39.5(18) of the Act, and submit any information relevant thereto. [Section 39.5(7)(o)(vi) of the Act]

ii. The IEPA shall assess annual fees based on the allowable emissions of all regulated air pollutants, except for those regulated air pollutants excluded in Section 39.5(18)(f) of the Act and insignificant activities in Section 6, at the source during the term of this permit. The amount of such fee shall be based on the information supplied by the applicant in its complete CAAPP permit application. [Section 39.5(18)(a)(ii)(A) of the Act]

iii. The check should be payable to "Treasurer, State of Illinois" and sent to: Fiscal Services Section, Illinois EPA, P.O. Box 19276, Springfield, IL, 62794-9276. Include on the check: ID #, Permit #, and "CAAPP Operating Permit Fees". [Section 39.5(18)(e) of the Act]

f. Obligation to Allow IEPA Surveillance

Pursuant to Sections 4(a), 39.5(7)(a), and 39.5(7)(p)(ii) of the Act, inspection and entry requirements that necessitate that, upon presentation of credentials and other documents as may be required by law and in accordance with constitutional limitations, the source shall allow the IEPA, or an authorized representative to perform the following:

i. Enter upon the source's premises where the emission unit(s) are located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit.

iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

iv. Sample or monitor any substances or parameters at any location at reasonable times:

A. As authorized by the Clean Air Act or the Act, at reasonable times, for the purposes of assuring compliance with this CAAPP permit or applicable requirements; or

B. As otherwise authorized by the Act.

v. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any activity, discharge or emission at the source authorized by this permit.

g. Effect of Permit

i. Pursuant to Section 39.5(7)(j)(iv) of the Act, nothing in this CAAPP permit shall alter or affect the following:

A. The provisions of Section 303 (emergency powers) of the CAA, including USEPA's authority under that Section.

B. The liability of the Owner or Operator of the source for any violation of applicable requirements prior to or at the time of permit issuance.

C. The applicable requirements of the acid rain program consistent with Section 408(a) of the Clean Air Act.

D. The ability of USEPA to obtain information from the source pursuant to Section 114 (inspections, monitoring, and entry) of the Clean Air Act.

ii. Notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, pursuant to Sections 39.5(7)(j) and (p) of the Act, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements. [35 IAC 201.122 and Section 39.5(7)(a) of the Act]

h. Severability Clause

The provisions of this permit are severable. In the event of a challenge to any portion of this permit, other portions of this permit may continue to be in effect. Should any portion of this permit be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected and the rights and obligations of the source shall be construed and enforced as if this permit did not contain the particular provisions held to be invalid and the applicable requirements underlying these provisions shall remain in force. [Section 39.5(7)(i) of the Act]

4. Testing

a. Tests conducted to measure composition of materials, efficiency of pollution control devices, emissions from process or control equipment, or other parameters shall be conducted using standard test methods if applicable test methods are not specified by the applicable regulations or otherwise identified in the conditions of this permit. Documentation of the test date, conditions, methodologies, calculations, and test results shall be retained pursuant to the recordkeeping procedures of this permit. Reports of

any tests conducted as required by this permit or as the result of a request by the IEPA shall be submitted as specified in Condition 7.1 of this permit. [35 IAC Part 201 Subpart J and Section 39.5(7)(a) of the Act]

b. Pursuant to Section 4(b) of the Act and 35 IAC 201.282, every emission source or air pollution control equipment shall be subject to the following testing requirements for the purpose of determining the nature and quantities of specified air contaminant emissions and for the purpose of determining ground level and ambient air concentrations of such air contaminants:

i. Testing by Owner or Operator: The IEPA may require the Owner or Operator of the emission source or air pollution control equipment to conduct such tests in accordance with procedures adopted by the IEPA, at such reasonable times as may be specified by the IEPA and at the expense of the Owner or Operator of the emission source or air pollution control equipment. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing. The IEPA shall have the right to observe all aspects of such tests.

ii. Testing by the IEPA: The IEPA shall have the right to conduct such tests at any time at its own expense. Upon request of the IEPA, the Owner or Operator of the emission source or air pollution control equipment shall provide, without charge to the IEPA, necessary holes in stacks or ducts and other safe and proper testing facilities, including scaffolding, but excluding instruments and sensing devices, as may be necessary.

5. Recordkeeping

a. Control Equipment Maintenance Records

Pursuant to Section 39.5(7)(b) of the Act, a maintenance record shall be kept on the premises for each item of air pollution control equipment. At a minimum, this record shall show the dates maintenance was performed and the nature of preventative maintenance activities.

b. Retention of Records

i. Records of all monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. [Section 39.5(7)(e)(ii) of the Act]

ii. Pursuant to Section 39.5(7)(a) of the Act, other records required by this permit including any logs, plans, procedures, or instructions required to be kept by this permit shall be retained for a period of at least 5 years from the date of entry unless a different period is specified by a particular permit provision.

c. Availability of Records

i. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall retrieve and provide paper copies, or as electronic media, any records retained in an electronic format (e.g., computer) in response to an IEPA or USEPA request during the course of a source inspection.

ii. Pursuant to Section 39.5(7)(a) of the Act, upon written request by the IEPA for copies of records or reports required to be kept by this permit, the Permittee shall promptly submit a copy of such material to the IEPA. For this purpose, material shall be submitted to the IEPA within 30 days unless additional time is provided by the IEPA or the Permittee believes that the volume and nature of

requested material would make this overly burdensome, in which case, the Permittee shall respond within 30 days with the explanation and a schedule for submittal of the requested material. (See also Condition 2.9(d))

6. Certification

a. Compliance Certification

i. Pursuant to Section 39.5(7)(p)(v)(C) of the Act, the source shall submit annual compliance certifications by May 1 unless a different date is specified by an applicable requirement or by a particular permit condition. The annual compliance certifications shall include the following:

A. The identification of each term or condition of this permit that is the basis of the certification.

B. The compliance status.

C. Whether compliance was continuous or intermittent.

D. The method(s) used for determining the compliance status of the source, both currently and over the reporting period consistent with the conditions of this permit.

ii. Pursuant to Section 39.5(7)(p)(v)(D) of the Act, all compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the IEPA Compliance Section. Addresses are included in Attachment 3.

iii. Pursuant to Section 39.5(7)(p)(i) of the Act, all compliance reports required to be submitted shall include a certification in accordance with Condition 2.6(b).

b. Certification by a Responsible Official

Any document (including reports) required to be submitted by this permit shall contain a certification by the responsible official of the source that meets the requirements of Section 39.5(5) of the Act and applicable regulations. [Section 39.5(7)(p)(i) of the Act]. An example Certification by a Responsible Official is included in Attachment 4 of this permit.

7. Permit Shield

a. Pursuant to Section 39.5(7)(j) of the Act, except as provided in Condition 2.7(b) below, the source has requested and has been granted a permit shield. This permit shield provides that compliance with the conditions of this permit shall be deemed compliance with applicable requirements which were applicable as of the date the proposed permit for this source was issued, provided that either the applicable requirements are specifically identified within this permit, or the IEPA, in acting on this permit application, has determined that other requirements specifically identified are not applicable to this source and this determination (or a concise summary thereof) is included in this permit. This permit shield does not extend to applicable requirements which are promulgated after _____ (date USEPA notice started), unless this permit has been modified to reflect such new requirements.

b. Pursuant to Section 39.5(7)(j) of the Act, this permit and the terms and conditions herein do not affect the Permittee's past and/or continuing obligation with respect to statutory or regulatory requirements governing major source construction or modification under Title I of the CAA. Further, neither the issuance of this permit nor any of the terms or conditions of the permit shall alter or affect the liability of the Permittee for any violation of applicable requirements prior to or at the time of permit issuance.

c. Pursuant to Section 39.5(7)(a) of the Act, the issuance of this permit by the IEPA does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting any currently pending or future legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the IEPA or the USEPA may have against the applicant including, but not limited to, any enforcement action authorized pursuant to the provision of applicable federal and state law.

8. Title I Conditions

Pursuant to Sections 39(a), 39(f), and 39.5(7)(a) of the Act, as generally identified below, this CAAPP permit may contain certain conditions that relate to requirements arising from the construction or modification of emission units at this source. These requirements derive from permitting programs authorized under Title I of the Clean Air Act (CAA) and regulations thereunder, and Title X of the Illinois Environmental Protection Act (Act) and regulations implementing the same. Such requirements, including the New Source Review programs for both major (i.e., PSD and nonattainment areas) and minor sources, are implemented by the IEPA.

a. This permit may contain conditions that reflect requirements originally established in construction permits previously issued for this source. These conditions include requirements from preconstruction permits issued pursuant to regulations approved or promulgated by USEPA under Title I of the CAA, as well as requirements contained within construction permits issued pursuant to state law authority under Title X of the Act. Accordingly, all such conditions are incorporated into this CAAPP permit by virtue of being either an “applicable Clean Air Act requirement” or an “applicable requirement” in accordance with Section 39.5 of the Act. These conditions are identifiable herein by a designation to their origin of authority.

b. This permit may contain conditions that reflect necessary revisions to requirements established for this source in preconstruction permits previously issued under the authority of Title I of the CAA. These conditions are specifically designated herein as “TIR.”

   i. Revisions to original Title I permit conditions are incorporated into this permit through the combined legal authority of Title I of the CAA and Title X of the Act. Public participation requirements and appeal rights shall be governed by Section 39.5 of the Act.

   ii. Revised Title I permit conditions shall remain in effect through this CAAPP permit, and are therefore enforceable under the same, so long as such conditions do not expire as a result of a failure to timely submit a complete renewal application or are not removed at the applicant’s request.

c. This permit may contain conditions that reflect new requirements for this source that would ordinarily derive from a preconstruction permit established under the authority of Title I of the CAA. These conditions are specifically designated herein as “TIN.”

   i. The incorporation of new Title I requirements into this CAAPP permit is authorized through the combined legal authority of Title I of the CAA and Title X of the Act. Public participation requirements and appeal rights shall be governed by Section 39.5 of the Act.

   ii. Any Title I conditions that are newly incorporated shall remain in effect through this CAAPP permit, and are therefore enforceable under the same, so long as such conditions do not expire as a result of a failure to timely submit a complete renewal application or are not removed at the applicant’s request.

9. Reopening and Revising Permit

a. Permit Actions

This permit may be modified, revoked, reopened and reissued, or terminated for cause in accordance with applicable provisions of Section 39.5 of the Act. The filing of a request by the source for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [Section 39.5(7)(o)(iii) of the Act]

b. Reopening and Revision

Pursuant to Section 39.5(15)(a) of the Act, this permit must be reopened and revised if any of the following occur:

i. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit;

ii. Additional requirements become applicable to the source for acid deposition under the acid rain program;

iii. The IEPA or USEPA determines that this permit contains a material mistake or that an inaccurate statement was made in establishing the emission standards or limitations, or other terms or conditions of this permit; or

iv. The IEPA or USEPA determines that this permit must be revised or revoked to ensure compliance with the applicable requirements.

c. Inaccurate Application

Pursuant to Sections 39.5(5)(e) and (i) of the Act, the IEPA has issued this permit based upon the information submitted by the source in the permit application referenced on page 1 of this permit. Any misinformation, false statement or misrepresentation in the application shall be grounds for revocation or reopening of this CAAPP under Section 39.5(15) of the Act.

d. Duty to Provide Information

The source shall furnish to the IEPA, within a reasonable time specified by the IEPA any information that the IEPA may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the source shall also furnish to the IEPA copies of records required to be kept by this permit. [Section 39.5(7)(o)(v) of the Act]

10. Emissions Trading Programs

No permit revision shall be required for increases in emissions allowed under any USEPA approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for elsewhere in this permit and that are authorized by the applicable requirement. [Section 39.5(7)(o)(vii) of the Act]

11. Permit Renewal

a. Upon the expiration of this permit, if the source is operated, it shall be deemed to be operating without a permit unless a timely and complete CAAPP application has been submitted for renewal of this permit. However, if a timely and complete application to renew this CAAPP permit has been submitted, the terms and all conditions of the most recent issued CAAPP permit will remain in effect until the issuance of a renewal permit. [Sections 39.5(5)(l) and (o) of the Act]

b. For purposes of permit renewal, a timely application is one that is submitted no less than 9 months prior to the date of permit expiration. [Section 39.5(5)(n) of the Act]

12. Permanent Shutdown

Pursuant to Section 39.5(7)(a) of the Act, this permit only covers emission units and control equipment while physically present at the source location(s). Unless this permit specifically provides for equipment relocation, this permit is void for the operation or activity of any item of equipment on the date it is removed from the permitted location(s) or permanently shut down. This permit expires if all equipment is removed from the permitted location(s), notwithstanding the expiration date specified on this permit.

13. Startup, Shutdown, and Malfunction

Pursuant to Section 39.5(7)(a) of the Act, in the event of an action to enforce the terms or conditions of this permit, this permit does not prohibit a Permittee from invoking any affirmative defense that is provided by the applicable law or rule.

Section 3 – Source Requirements

1. Applicable Requirements

Pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act, the Permittee shall comply with the following applicable requirements. These requirements are applicable to all emission units (including insignificant activities unless specified otherwise in this Section) at the source.

a. Fugitive Particulate Matter

i. Pursuant to 35 IAC 212.301 and 35 IAC 212.314, no person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally toward the zenith at a point beyond the property line of the source unless the wind speed is greater than 25 mph.

ii. Compliance Method (Fugitive Particulate Matter)

Upon request by the IEPA, the Permittee shall conduct observations at the property line of the source for visible emissions of fugitive particular matter from the source to address compliance with 35 IAC 212.301. For this purpose, daily observations shall be conducted for a week for particular area(s) of concern at the source, as specified in the request, observations shall begin either within one day or three days of receipt of a written request from the IEPA, depending, respectively, upon whether observations will be conducted by employees of the Permittee or a third-party observer hired by the Permittee to conduct observations on its behalf. The Permittee shall keep records for these observations, including identity of the observer, the date and time of observations, the location(s) from which observations were made, and duration of any fugitive emissions event(s).

b. Emissions Reduction Market System (ERMS)

Pursuant to 35 IAC Part 205, this source is considered a “participating source” for purposes of the ERMS. The allotment of ATUs to this source is 391 ATUs per seasonal allotment period. The Permittee shall comply with all applicable requirements in Section 7.3.

c. Ozone Depleting Substances

Pursuant to 40 CFR 82.150(b), the Permittee shall comply with the standards for recycling and emissions reduction of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

i. Pursuant to 40 CFR 82.156, persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices.

ii. Pursuant to 40 CFR 82.158, equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment.

iii. Pursuant to 40 CFR 82.161, persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program.

iv. Pursuant to 40 CFR 82 Subpart B, any person performing service on a motor vehicle for consideration when this service involves the refrigerant in the motor vehicle air conditioner shall comply with 40 CFR 82 Subpart B, Servicing of Motor Vehicle Air Conditioners.

v. Pursuant to 40 CFR 82.166, all persons shall comply with the reporting and recordkeeping requirements of 40 CFR 82.166.

d. Asbestos Demolition and Renovation

i. Asbestos Fees. Pursuant to Section 9.13(a) of the Act, for any site for which the Owner or Operator must file an original 10-day notice of intent to renovate or demolish pursuant to Condition 3.1(d)(ii) below and 40 CFR 61.145(b), the owner or operator shall pay to the IEPA with the filing of each 10-day notice a fee of $150.

ii. Pursuant to 40 CFR 61 Subpart M, Standard of Asbestos, prior to any demolition or renovation at this facility, the Permittee shall fulfill notification requirements of 40 CFR 61.145(b).

iii. Pursuant to 40 CFR 61.145(c), during demolition or renovation, the Permittee shall comply with the procedures for asbestos emission control established by 40 CFR 61.145(c).

e. Future Emission Standards

Pursuant to Section 39.5(15)(a) of the Act, this source shall comply with any new or revised applicable future standards of 40 CFR 60, 61, 62, or 63; or 35 IAC Subtitle B after the date issued of this permit. The Permittee shall, in accordance with the applicable regulation(s), comply with the applicable requirements by the date(s) specified and shall certify compliance with the applicable requirements of such regulation(s) as part of the annual compliance certification, as required by Condition 2.6(a). This permit may also have to be revised or reopened to address such new regulations in accordance to Condition 2.9.

2. Applicable Plans and Programs

Pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act, the Permittee shall comply with the following applicable requirements. These requirements are applicable to all emission units (including insignificant activities unless specified otherwise in this Section) at the source.

a. Fugitive PM Operating Program

i. Pursuant to 35 IAC 212.309, this source shall be operated under the provisions of Fugitive PM Operating Program prepared by the Permittee and submitted to the IEPA for its review. The Fugitive PM Operating Program shall be designed to significantly reduce fugitive particulate matter emissions, pursuant to 35 IAC 212.309(a). The Permittee shall comply with the Fugitive PM Operating Program and any amendments to the Fugitive PM Operating Program submitted pursuant to Condition 3.2(a)(ii). As a minimum, the Fugitive PM Operating Program shall include provisions identified in 35 IAC 212.310(a) through (g) and the following:

A. A detailed description of the best management practices utilized to achieve compliance with 35 IAC 212.304 through 212.308.

B. Estimated frequency of application of dust suppressants by location.

C. Such other information as may be necessary to facilitate the IEPA's review of the Fugitive PM Operating Program.

ii. Pursuant to 35 IAC 212.312, the Fugitive PM Operating Program shall be amended from time to time by the Permittee so that the Fugitive PM Operating Program is current. Such amendments shall be consistent with the requirements set forth by this Condition 3.2(a) and shall be submitted to the IEPA within 30 days of such amendment. Any future revision to the Fugitive PM Operating Program made by the

Permittee during the permit term is automatically incorporated by reference provided the revision is not expressly disapproved, in writing, by the IEPA within 30 days of receipt of the revision. In the event that the IEPA notifies the Permittee of a deficiency with any revision to the Fugitive PM Operating Program, the Permittee shall be required to revise and resubmit the Fugitive PM Operating Program within 30 days of receipt of notification to address the deficiency pursuant to Section 39.5(7)(a) of the Act.

iii. The Fugitive PM Operating Program, as submitted by the Permittee on 7/6/2006, is incorporated herein by reference. The document constitutes the formal Fugitive PM Operating Program required under 35 IAC 212.310, addressing the control of fugitive particulate matter emissions from all plant roadways, including the iron-making and steel-making roads, storage piles, access areas near storage piles, and other subject operations located at the facility that are subject to 35 IAC 212.309.

iv. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep a copy of the Fugitive PM Operating Program, any amendments or revisions to the Fugitive PM Operating Program (as required by Condition 3.2(a)), and the Permittee shall also keep a record of activities completed according to the Fugitive PM Operating Program.

b. PM_{10} Contingency Measure Plan

Should this source become subject to 35 IAC 212.700, then the Permittee shall prepare and operate under a PM_{10} Contingency Measure Plan reflecting the PM_{10} emission reductions as set forth in 35 IAC 212.701 and 212.703. The Permittee shall, within 90 days after the date this source becomes subject to 35 IAC 212.700, submit a request to modify this CAAPP permit in order to include a new, appropriate PM_{10} Contingency Measure Plan.

c. Episode Action Plan

Should this stationary source become subject to the Episode Action Plan, Pursuant to 35 IAC 244.142, then the Permittee shall submit an Episode Action Plan.

d. Risk Management Plan (RMP)

Should this stationary source, as defined in 40 CFR 68.3, become subject to the federal regulations for Chemical Accident Prevention in 40 CFR Part 68, then the Permittee shall submit a compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or submit a certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan, as part of the annual compliance certification required by Condition 2.6(a). This condition is imposed in this permit pursuant to 40 CFR 68.215(a)(2)(i) and (ii).

3. Title I Requirements

As of the date of issuance of this permit, there are no source-wide Title I requirements that need to be included in this Condition.

4. Synthetic Minor Limits

As of the date of issuance of this permit, there are no source-wide synthetic minor limits that need to be included in this Condition.

5. Reporting Requirements

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act. Addresses are included in Attachment 3.

a. Prompt Reporting

i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows:

I. Requirements in Conditions 3.1(a)(i), 3.1(b), 3.1(c), and 3.1(d).

II. Requirements in Conditions 3.2(a), 3.2(b), 3.2(c), and 3.2(d).

B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).

ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).

iii. The deviation reports shall contain at a minimum the following information:

A. Date and time of the deviation.

B. Emission unit(s) and/or operation involved.

C. The duration of the event.

D. Probable cause of the deviation.

E. Corrective actions or preventative measures taken.

iv. All deviation reports required in this Permit shall be identified, summarized, and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).

b. Semiannual Reporting

i. Pursuant to Section 39.5(7)(f)(i) of the Act, the Permittee shall submit Semiannual Monitoring Reports to the IEPA, Air Compliance Section, summarizing required monitoring as part of the Compliance Methods in this Permit submitted every six months as follows, unless more frequent reporting is required in other parts of this permit.

Monitoring Period	Report Due Date
January through June	July 31
July through December	January 31

ii. The Semiannual Monitoring Report must be certified by a Responsible Official consistent with Condition 2.6(b).

c. Annual Emissions Reporting

Pursuant to 35 IAC Part 254, the Source shall submit an Annual Emission Report to the Air Quality Planning Section, due by May 1 of the year following the calendar year in which the emissions took place. All records and calculations upon which the verified and reported data are based must be retained by the source.

Section 4 – Emission Unit Requirements

4.1 Sheet-fed Non-Heatset Offset Lithographic Printing Operation Lines #1 and #2

1. Emission Units and Operations

Emission Units	*Pollutants Being Regulated*	*Original Construction Date*	*Modification/ Reconstruction Date*	*Air Pollution Control Devices or Measures*	*Monitoring Devices*
Printing Line #1	PM and VOM	1997	N/A	None	None
Printing Line #2	PM and VOM	2005	N/A	None	None

2. Applicable Requirements

For the emission units in Condition 4.1.1 above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

a. i. Opacity Requirements

A. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit.

ii. Compliance Method (Opacity Requirements)

Monitoring

A. Pursuant to Sections 39.5(7)(b) and (d) of the Act, at a minimum, the Permittee shall perform observations for opacity on each press or common stack in accordance with Method 22 for visible emissions at least once every calendar year. If visible emissions are observed, the Permittee shall take corrective action within 4 hours of such observation. Corrective action may include, but is not limited to, shut down of the press, maintenance and repair and/ or adjustment of operation. If corrective action was taken the Permittee shall perform a follow-up observation for visible emissions in accordance with Method 22. If visible emissions continue, then measurements of opacity in accordance with Method 9 and Section 7.1 shall be conducted within one week in accordance with Condition 2.4.

Recordkeeping

B. Pursuant to Section 39.5(7)(b) and (e) of the Act, the Permittee shall keep records for each observation for opacity conducted. These records shall include, at a minimum: date and time the observation was performed, name(s) of observing personnel, identification of which equipment was observed, whether or not the equipment was running properly, the findings of the observation including the presence of any visible emissions, and a description of any corrective action taken including if the corrective action took place within 4 hours of the observation.

C. Pursuant to Section 39.5(7)(b) and (e) of the Act, the Permittee shall keep records for all opacity measurements made in accordance with USEPA Method 9.

b. i. Particulate Matter Requirements (PM)

A. Pursuant to 35 IAC 212.321(a), no person shall cause or allow the emission of PM into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of PM

from all other similar process emission units at a source or premises, exceeds the allowable emission rates specified in 35 IAC 212.321(c). (See also Condition 7.2).

ii. Compliance Method (PM Requirements)

Recordkeeping

A. Pursuant to Section 39.5(7)(b) and (e) of the Act, the Permittee shall keep the following records related to PM emissions:

I. The hours of operation for each printing press, hr/mo and hr/yr.

II. The emissions of PM from each printing line, lb/mo and ton/yr (12 month rolling average), with supporting calculations, which address the hourly limits of 35 IAC 212.321.

c. i. Volatile Organic Material Requirements (VOM)

A. Pursuant to 35 IAC 218.301, no person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere from any emission unit, except as provided in 35 IAC 218.302, 218.303, 218.304 and with the following exception: If no odor nuisance exists the limitation of this Subpart shall apply only to photochemically reactive material.

B. Pursuant to 35 IAC 218.407(a)(3)(A), no owner or operator of lithographic printing lines shall cause or allow the operation of any sheet-fed offset lithographic printing line unless the VOM content of the as-applied fountain solution is 5 percent or less, by weight.

C. Pursuant to 35 IAC 218.407(a)(4), no owner or operator of lithographic printing lines shall cause or allow the use of a cleaning solution on any lithographic printing line unless:

I. The VOM content of the as-used cleaning solution is less than or equal to 30 percent, by weight; or

II. The VOM composite partial vapor pressure of the as-used cleaning solution is less than 10 mmHg at 20°C (68°F).

D. Pursuant to Construction Permit #04070048, Lithographic Printing line #2 is subject to the following: [T1]

I. Total ink usage on the lithographic printing line #2 shall not exceed 3,800 lbs/month and 38,000 lbs/yr.

II. VOM emissions from the lithographic printing line #2 shall not exceed 0.2 tons/month and 2.0 tons/year.

E. Pursuant to a revised Construction Permit #97120039 limit, Lithographic Printing line #1 is subject to the following: [T1R]

I. Total ink usage (includes inks, coatings and varnishes) on the lithographic printing line #1 shall not exceed 15,500 lbs/month and 155,000 lbs/yr.

II. VOM emissions from the lithographic printing line #1 shall not exceed 1.0 tons/month and 10.0 tons/year.

ii. Compliance Method (VOM Requirements)

Monitoring

A. If automated equipment is used, pursuant to 35 IAC 218.410(b)(2), the Permittee shall determine the VOM content of the as-applied fountain solution based on the setting of the automatic feed equipment which makes additions to VOM up to a pre-set level. The equipment used to make automatic additions must be calibrated, operated and maintained in accordance with manufacturer specifications.

B. I. Pursuant to 35 IAC 218.410(c)(1), the owner or operator of any lithographic printing line relying on the VOM content of the cleaning solution to comply with 35 IAC 218.407(a)(4)(A) must:

1) For cleaning solutions that are prepared at the source with equipment that automatically mixes cleaning solvent and water (or other non-VOM):

i) Operate, maintain, and calibrate the automatic feed equipment in accordance with manufacturer's specifications to regulate the volume of each of the cleaning solvent and water (or other non-VOM), as mixed; and

ii) Pre-set the automatic feed equipment so that the consumption rates of the cleaning solvent and water (or other non-VOM), as applied, comply with 35 IAC 218.407(a)(4)(A);

2) For cleaning solutions that are not prepared at the source with automatic feed equipment, keep records of the usage of cleaning solvent and water (or other non-VOM) according to Condition 4.1.2(c)(ii)(G)(II).

II. Pursuant to 35 IAC 218.410(e)(2), the owner or operator of any lithographic printing line relying on the vapor pressure of the cleaning solution to comply with 35 IAC 218.407(a)(4)(B) must keep records for such cleaning solutions used on any such lines as set forth in Condition 4.1.2(c)(ii)(G)(III).

Testing

C. Pursuant to 35 IAC 218.409(c), testing to demonstrate compliance with the applicable VOM content limitations under Conditions 4.1.2(c)(i)(B) and 4.1.2(c)(i)(C)(I) shall be conducted by testing or using manufacturer's specifications as follows:

I. On an annual basis, the VOM content of the fountain solution "as applied" shall be determined by Method 24 of 40 CFR 60, Appendix A.

II. On an annual basis, the VOM content of cleaning solvents shall be determined by Method 24 and Method 24A of 40 CFR 60, Appendix A.

III. The manufacturer's specifications for VOM content for fountain solution additives and cleaning solvents may be used if such manufacturer's specifications are based on the results of tests of VOM content conducted in accordance with Method 24 and/or Method 24A of 40 CFR 60, Appendix A, and the Permittee's records directly reflect the application of such material and separately account for any additions of solvent.

D. Pursuant to 35 IAC 218.409(e), testing to determine the VOM composite partial vapor pressure of cleaning solvents, cleaning solvent concentrates,

and as-used cleaning solutions shall be conducted in accordance with the applicable methods and procedures specified in 35 IAC 218.110.

Recordkeeping

E I. Pursuant to 35 IAC 218.411(e)(2)(A), the owner or operator shall collect and record the name and identification of each batch of fountain solution prepared for use on one or more lithographic printing lines, the lithographic printing lines or centralized reservoir using such batch of fountain solution, and the applicable VOM content limitation for the batch.

II. If automated equipment is used pursuant to 35 IAC 218.411(e)(2)(D), the Permittee shall collect and record the following for each automatic feed equipment setting:

1) VOM content limit corresponding to each setting;

2) Date and time of initial setting and each subsequent setting; and

3) Documentation of the periodic calibration of the automatic feed equipment in accordance with the manufacture's specifications.

F. Pursuant to 35 IAC 218.411(f)(2)(A-C), the owner or operator shall collect and record the following information for each cleaning solution used on each printing line:

I. For each cleaning solution for which the owner or operator relies on the VOM content to demonstrate compliance with 35 IAC 218.407(a)(4)(A) and that is prepared at the source with automatic equipment:

1) The name and identification of each cleaning solution;

2) The VOM content of each cleaning solvent in the cleaning solution, as determined in accordance with 35 IAC 218.409(c);

3) Each change to the setting of the automatic equipment, with date, time, description of changes in the cleaning solution constituents (e.g., cleaning solvents), and a description of changes to the proportion of cleaning solvent and water (or other non-VOM);

4) The proportion of each cleaning solvent and water (or other non-VOM) used to prepare the as-used cleaning solution;

5) The VOM content of the as-used cleaning solution, with supporting calculations; and

6) A calibration log for the automatic equipment, detailing periodic checks.

II. For each batch of cleaning solution for which the owner or operator relies on the VOM content to demonstrate compliance with 35 IAC 218.407(a)(4)(A) and which is not prepared at the source with automatic equipment:

1) The name and identification of each cleaning solution;

2) Date and time of preparation, and each subsequent modification, of the batch;

3) The VOM content of each cleaning solvent in the cleaning solution, as determined in accordance with 35 IAC 218.409(c);

4) The total amount of each cleaning solvent and water (or other non-VOM) used to prepare the as-used cleaning solution; and

5) The VOM content of the as-used cleaning solution, with supporting calculations. For cleaning solutions that are used as purchased, the manufacturer's specifications for VOM content may be used if such manufacturer's specifications are based on results of tests of the VOM content conducted in accordance with methods specified in 35 IAC 218.105(a).

III. For each batch of cleaning solution for which the owner or operator relies on the vapor pressure of the cleaning solution to demonstrate compliance with 35 IAC 218.407(a)(4)(B):

1) The name and identification of each cleaning solution;

2) Date and time of preparation, and each subsequent modification, of the batch;

3) The molecular weight, density, and VOM composite partial vapor pressure of each cleaning solvent, as determined in accordance with 35 IAC 218.409(e). For cleaning solutions that are used as purchased, the manufacturer's specifications for VOM composite partial vapor pressure may be used if such manufacturer's specifications are based on results of tests conducted in accordance with methods specified in 35 IAC 218.105(a) and 218.110;

4) The total amount of each cleaning solvent used to prepare the as-used cleaning solution; and

5) The VOM composite partial vapor pressure of each as-used cleaning solution in mmHg at 20°C (68°F). For cleaning solutions that are used as purchased, the manufacturer’s specifications for VOM composite partial pressure may be used if such manufacturer’s specifications are based on results of tests conducted in accordance with methods specified in 35 IAC 218.105(c) and 218.110.

G. Pursuant to 39.5(7)(b) and (e) of the Act, the Permittee shall maintain the following records:

I. The emissions of VOM from each press, tons/mo and ton/yr (12 month rolling average), with supporting calculations.

II. Hours of operation for each printing line (hr/month and hr/year).

III. The following information shall be kept for each Press:

A. The usage of ink, coating, fountain solution, cleaning solution and any other VOM containing materials used (lb/month and ton/year).

B. VOM content of as-applied cleaning solution and fountain solution.

IV. Results of VOM content testing for VOM containing waste, if applicable.

d. i. Work Practice Requirements

A. Pursuant to 35 IAC 218.407(a)(5), no owner or operator of lithographic printing lines shall cause or allow VOM containing cleaning materials, including used cleaning towels, associated with any lithographic printing line to be kept, stored or disposed of in any manner other than in closed containers, except when specifically in use.

B. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall maintain and operate each press in a manner consistent with good air pollution control practice for minimizing emissions and the manufacturer(s) maintenance procedures, as specified.

ii. Compliance Method (Work Practice Requirements)

Monitoring

A. Pursuant to Section 39.5(7)(b) and (d) of the Act, the Permittee shall perform preventive maintenance on each press in accordance with the manufacturer(s) recommendation(s).

B. Pursuant to 35 IAC 218.411(f)(2)(D) and Sections 39.5(7)(a & d) of the Act, the Permittee shall perform quarterly inspections of VOM-containing cleaning material containers to ensure that the work practice requirements of 35 IAC 218.407(a)(5) are performed.

Recordkeeping

C. Pursuant to 35 IAC 218.411(f)(2)(D) and Section 39.5(7)(b) of the Act, the Permittee shall collect and record the following for each inspection performed, as required by Condition 4.1.2(d)(ii)(B), to ensure compliance with 35 IAC 218.407(a)(5):

I. Date, time and duration of the inspections performed;

II. Name(s) of inspection personnel;

III. Identification of work practices being inspected;

IV. Any instances of improper use of closed containers, with descriptions of actual practice and corrective action taken, if any.

D. Pursuant to Section 39.5(7)(b) and (e) of the Act, the Permittee shall keep records of preventive maintenance performed, as required by Condition 4.1.2(d)(ii)(A), along with a maintenance and repair log. These records shall include, at a minimum:

I. Date and time of the preventive maintenance activity;

II. Name(s) of personnel performing the preventative maintenance;

III. Identification of the press on which preventive maintenance is being performed;

IV. A description of all maintenance and repair activities performed including if the activity resulted in a modification or reconstruction of the piece of equipment; and

V. A document demonstrating the preventative maintenance activity/activities recommended by the manufacturer(s) that are to be performed on each press.

3. Non-Applicability Determinations

a. The presses are not subject to the New Source Performance Standards (NSPS) for Subpart QQ—Standards of Performance for the Graphic Arts Industry: Publication Rotogravure Printing, 40 CFR Part 60 Subpart QQ, because the presses are not publication rotogravure printing presses.

b. The presses are not subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Printing and Publishing Industry, 40 CFR 63, Subparts A , KK and OOOO , because the presses are not publication rotogravure, product and packaging rotogravure, or wide-web flexographic printing presses, and do not coat or print fabric or other textiles.

c. The presses are not subject to 35 IAC 214.301 because due to the nature of the process there are no SO_2 emissions from the printing lines.

d. Pursuant to 35 IAC 218.187(a)(2)(B)(ii), the lithographic presses are exempt from any requirements of 35 IAC 218.187, which includes 35 IAC 218.187(b),(c),(d),(e),(f), and (g) because the source is subject to the requirements of the Lithographic Printing regulations.

e. Pursuant to 35 IAC 218.204(c)(3), the presses are not subject to the requirements of 35 IAC 218.204(c), Paper Coating, because 35 IAC 218.204(c) shall not apply to any owner or operator of any paper coating line on which lithographic printing is performed if the paper coating line complies with the applicable emissions limitations in 35 IAC Subpart H, Printing and Publishing.

f. The Lithographic Printing lines, which includes lines #1 and #2, is not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources for PM or VOM, because the Lithographic Printing lines, which includes lines #1 and #2, does not use an add-on control device to achieve compliance with an emission limitation or standard.

4. Other Requirements

As of the date of issuance of this permit, there are no other requirements that need to be included in this Condition.

5. Reporting Requirements

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act. Addresses are included in Attachment 3.

a. <u>Prompt Reporting</u>

i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows unless a different period is specified by a particular permit provision, i.e., NSPS or NESHAP requirement:

I. Requirements in Conditions 4.1.2(a)(i), 4.1.2(b)(i), 4.1.2(c)(i), and 4.1.2(d)(i).

B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).

ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).

iii. The deviation reports shall contain at a minimum the following information:

A. Date and time of the deviation.

B. Emission unit(s) and/or operation involved.

C. The duration of the event.

D. Probable cause of the deviation.

E. Corrective actions or preventative measures taken.

4.2 Flexographic Printing Operation Lines #4 and #5

1. Emission Units and Operations

Emission Units	*Pollutants Being Regulated*	*Original Construction Date*	*Modification/ Reconstruction Date*	*Air Pollution Control Devices or Measures*	*Monitoring Devices*
Printing Line #4	VOM and PM	1989	N/A	None	None
Printing Line #5	VOM and PM	1997	N/A	None	None

2. Applicable Requirements

For the emission units in Condition 4.2.1 above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

a. i. Opacity Requirements

A. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit.

ii. Compliance Method (Opacity Requirements)

Monitoring

A. Pursuant to Sections 39.5(7)(b) and (d) of the Act, at a minimum, the Permittee shall perform observations for opacity on each press or common stack in accordance with Method 22 for visible emissions at least once every calendar year. If visible emissions are observed, the Permittee shall take corrective action within 4 hours of such observation. Corrective action may include, but is not limited to, shut down of the press, maintenance and repair and/ or adjustment of operation. If corrective action was taken the Permittee shall perform a follow-up observation for visible emissions in accordance with Method 22. If visible emissions continue, then measurements of opacity in accordance with Method 9 and Section 7.1 shall be conducted within one week in accordance with Condition 2.4.

Recordkeeping

B. Pursuant to Section 39.5(7)(b) and (e) of the Act, the Permittee shall keep records for each observation for opacity conducted. These records shall include, at a minimum: date and time the observation was performed, name(s) of observing personnel, identification of which equipment was observed, whether or not the equipment was running properly, the findings of the observation including the presence of any visible emissions, and a description of any corrective action taken including if the corrective action took place within 4 hours of the observation.

C. Pursuant to Section 39.5(7)(b) and (e) of the Act, the Permittee shall keep records for all opacity measurements made in accordance with USEPA Method 9.

b. i. Particulate Matter Requirements (PM)

A. Pursuant to 35 IAC 212.321(a), no person shall cause or allow the emission of PM into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of PM from all other similar process emission units at a source or premises, exceeds the allowable emission rates specified in 35 IAC 212.321(c). (See also Condition 7.2).

ii. Compliance Method (PM Requirements)

Recordkeeping

A. Pursuant to Section 39.5(7)(b) and (e) of the Act, the Permittee shall keep the following records related to PM emissions:

I. The hours of operation for the printing press, hr/mo and hr/yr.

II. The emissions of PM from the printing press, lb/mo and ton/yr (12 month rolling average), with supporting calculations.

c. i. Volatile Organic Material Requirements (VOM)

A. Pursuant to 35 IAC 218.301, no person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere from any emission unit, except as provided in 35 IAC 218.302, 218.303, 218.304 and with the following exception: If no odor nuisance exists the limitation of this Subpart shall apply only to photochemically reactive material.

B. Pursuant to a [T1R] condition in the previously issued CAAPP permit, total combined emissions and operations of the flexographic printing lines #4 and #5 shall not exceed the following limits:

I. Total material usage and VOM emissions for lines #4 and #5 shall not exceed the following limits [T1]:

VOM Usage		VOM Emissions	
(Lb/mo)	(t/yr)	(Lb/mo)	(t/yr)
535	1.60	535	1.60

ii. Compliance Method (VOM Requirements)

Recordkeeping

A. Pursuant to 35 IAC 218.404(c)(2), the Permittee shall collect and record all of the following information:

I. The name and identification number of each coating and ink as applied on the printing line.

II. The VOM content of each coating and ink as applied on the printing line.

B. Pursuant to Section 39.5(7)(b) and (e) of the Act, the Permittee shall maintain the following records for the flexographic printing lines:

I. The emissions of VOM, tons/mo and ton/yr (12 month rolling average), with supporting calculations.

II. VOM usage tons/mo and ton/yr.

III. Results of VOM content testing for VOM containing waste, if applicable.

d. i. Work Practice Requirements

A. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall maintain and operate the press in a manner consistent with good air pollution control practice for minimizing emissions.

B. Pursuant to 35 IAC 218.187(d), the owner or operator shall comply with the following for the cleaning operations associated with the flexographic printer:

I. Cover open containers and properly cover and store applicators used to apply cleaning solvents;

II. Minimize air circulation around the cleaning operation;

III. Dispose of all used cleaning solutions, cleaning towels, and applicators used to apply cleaning solvents in closed containers;

IV. Utilize equipment practices that minimize emissions;

V. When using cleaning solvent for wipe cleaning, sources that manufacture coatings, inks, adhesives, or resins shall:

1) Cover open containers used for the storage of spent or fresh organic compounds used for cleanup or coating, ink, adhesive, or resin removal; and

2) Cover open containers used for the storage or disposal of cloth or paper impregnated with organic compounds that are used for cleanup or coating, ink, adhesive, or resin removal.

ii. Compliance Method (Work Practice Requirements)

Monitoring

A. Pursuant to Section 39.5(7)(b) and (d) of the Act, the Permittee shall perform preventive maintenance on the printing lines in accordance with the manufacturer recommendation(s).

B. Pursuant to Section 39.5(7)(b) and (d) of the Act, the Permittee shall perform quarterly inspections of the cleaning operations associated with the flexographic printing lines to ensure that the work practice requirements listed in Condition 4.2.2(d)(i)(B) are performed.

Recordkeeping

C. Pursuant to Section 39.5(7)(b) and (e) of the Act, the Permittee shall keep records of each inspection performed, as required by Condition 4.2.2(d)(ii)(B). These records shall include, at a minimum: date and time inspections were performed, name(s) of inspection personnel, identification of equipment being inspected, and findings of the inspection (specifically noting compliance with the work practice requirements of Condition 4.2.2(d)(i)(B)).

D. Pursuant to Section 39.5(7)(b) and (e) of the Act, the Permittee shall keep records of preventive maintenance performed, as required by Condition 4.2.2(d)(ii)(A), along with a maintenance and repair log. These records shall include, at a minimum: date and time of the preventive maintenance activity, name(s) of personnel performing the preventative maintenance, identification of the press on which preventive maintenance is being performed, a description of all maintenance and repair activities performed including if the activity resulted in a modification or reconstruction of the piece of equipment, and a document demonstrating the preventative

maintenance activity/activities recommended by the manufacturer that are to be performed on the press.

3. Non-Applicability Determinations

a. The flexographic printing lines are not subject to the New Source Performance Standards (NSPS) for Subpart QQ—Standards of Performance for the Graphic Arts Industry: Publication Rotogravure Printing, 40 CFR Part 60 Subpart QQ, because the presses are not publication rotogravure printing presses.

b. For Hazardous Air Pollution (NESHAP) for the Printing and Publishing Industry, 40 CFR Part 63 Subpart KK, because the Flexographic Printing Operation (Press #8) is not located at a major source of HAPs, as defined by 40 CFR 63.2.

c. The flexographic printing lines (including solvents used for cleanup operations associated with flexographic printing line(s)) are exempted from the limitations of 35 IAC 218.401 because maximum theoretical emissions and potential to emit of VOM are less than 100 t/year and 25 t/year, respectively, from all affected flexographic printing lines pursuant to 35 IAC 218.402(a).

d. The flexographic printing lines are not subject to the National Emission Standard for Hazardous Air Pollutants (NESHAP) for the flexographic and rotogravure printing, 40 CFR 63 Subpart KK, because these lines do perform printing on the web up to 16 inches wide and therefore are exempt from the definition of the “wide-web flexographic press” under Subpart KK.

e. The Flexographic Printing lines are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources for PM and VOM, because the Flexographic Printing lines does not use an add-on control device to achieve compliance with an emission limitation or standard.

f. The flexographic printing lines are not subject to 35 IAC 218.187, Other Industrial Solvent Cleaning Operations because the source’s cleaning operations do not use organic material that emit more than 500 lb/month.

4. Other Requirements

As of the date of issuance of this permit, there are no other requirements that need to be included in this Condition.

5. Reporting Requirements

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act. Addresses are included in Attachment 3.

a. <u>Prompt Reporting</u>

i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows unless a different period is specified by a particular permit provision, i.e., NSPS or NESHAP requirement:

I. Requirements in Conditions 4.2.2(a)(i), 4.2.2(b)(i), 4.2.2(c)(i), and 4.2.2(d)(i).

B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).

ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).

iii. The deviation reports shall contain at a minimum the following information:

A. Date and time of the deviation.

B. Emission unit(s) and/or operation involved.

C. The duration of the event.

D. Probable cause of the deviation.

E. Corrective actions or preventative measures taken.

4.3 Coating Lines #1, #3, SL-1 and #4 with Ovens

1. Emission Units and Operations

Emission Units	*Pollutants Being Regulated*	*Original Construction Date*	*Modification/ Reconstruction Date*	*Air Pollution Control Devices or Measures*	*Monitoring Devices*
Coating Line #1	PM, VOM, and HAPs	1993	N/A	None	None
Coating Line #3 (same oxidizer controls PSL-1)	PM, SO_2, VOM, and HAPs	1959	Routed to an afterburner in 1994	Permanent Total Enclosure and Catalytic Oxidizer Combustion Temperature Monitors	
Spray Line #1 (PSL-1) When Compliant Coatings are used, control is not required	PM, SO_2, VOM, and HAPs	2005	N/A		
Coating Line #4	PM, VOM and HAPs	1985	N/A	None	N/A

Spray Coating Line #2 is not constructed yet and may operate under this CAAPP permit and shall keep the construction permit requirements of permit 12060025 listed in section 7.6 of this permit.

2. Applicable Requirements

For the emission units in Condition 4.4.1 above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

a. i. Opacity Requirements

A. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit.

ii. Compliance Method (Opacity Requirements)

Monitoring

A. Pursuant to Sections 39.5(7)(b) and (d) of the Act, at a minimum, the Permittee shall perform observations for opacity on each emission unit or common stack in accordance with Method 22 for visible emissions at least once every calendar year. If visible emissions are observed, the Permittee shall take corrective action within 4 hours of such observation. Corrective action may include, but is not limited to, shut down of the emission unit, maintenance and repair and/ or adjustment of operation. If corrective action was taken the Permittee shall perform a follow-up observation for visible emissions in accordance with Method 22. If visible emissions continue, then measurements of opacity in accordance with Method 9 and Section 7.1 shall be conducted within one week in accordance with Condition 2.4.

Recordkeeping

B. Pursuant to Section 39.5(7)(b) and (e) of the Act, the Permittee shall keep records for each observation for opacity conducted. These records shall include, at a minimum: date and time the observation was performed, name(s) of observing personnel, identification of which equipment was observed, whether or not the equipment was running properly, the findings of the

observation including the presence of any visible emissions, and a description of any corrective action taken including if the corrective action took place within 4 hours of the observation.

C. Pursuant to Section 39.5(7)(b) and (e) of the Act, the Permittee shall keep records for all opacity measurements made in accordance with USEPA Method 9.

b. i. Particulate Matter Requirements (PM)

A. Pursuant to 35 IAC 212.321(a), no person shall cause or allow the emission of PM into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of PM from all other similar process e mission units at a source or premises, exceeds the allowable emission rates specified in 35 IAC 212.321(c). (See also Condition 7.2).

ii. Compliance Method (PM Requirements)

Recordkeeping

A. Pursuant to Section 39.5(7)(b) and (e) of the Act, the Permittee shall keep the following records related to PM emissions:

I. The hours of operation for each coating line, hr/mo and hr/yr.

II. The emissions of PM from each coating line, lb/mo and ton/yr (12 month rolling average), with supporting calculations.

c. i. Sulfur Dioxide Requirements (SO_2)

A. Pursuant to 35 IAC 214.301, the Permittee shall not cause or allow the emission of sulfur dioxide into the atmosphere from any drying oven or afterburner to exceed 2000 ppm.

ii. Compliance Method (SO_2 Requirements)

Recordkeeping

A. Pursuant to Section 39.5(7)(b) and (e) of the Act, the Permittee shall keep on file a document from the gas company indicating that the sulfur content of the natural gas will result in SO_2 emissions less than 2000 ppm.

d. i. Volatile Organic Material Requirements (VOM)

A. Pursuant to 35 IAC 218.204(c)(2)(B), no owner or operator shall apply at any time a coating (e.g., glue) in which the VOM content exceeds the emission limitations for paper coating, as follows:

kg VOM/kg (lb VOM/lb) solids applied	kg VOM/kg (lb VOM/lb) coatings applied
0.40	0.08

B. Pursuant to 35 IAC 218.207(a) and (b)(1), the owner or operator of Coating Line 3 and SL-1, shall operate these lines, when using non-compliant coatings (Lacquer), such that emissions of VOM are the result of a capture and control providing 81% reduction overall and the control device providing a 90 percent efficiency.

C. Pursuant to Construction Permit # 00080079, emissions of VOM from coating Line 1 shall not exceed 1.36 ton/mo and 10.00 ton/yr. [T1]

D. Pursuant to Construction Permit # 00080079, emissions of VOM from coating Line 3 shall not exceed 0.6 ton/mo and 3.9 ton/yr (Lacquer Coating) and 0.3 ton/mo and 0.4 ton/yr (Latex Coating). [T1]

E. Pursuant to Construction Permit # 05070045, emissions of VOM from coating Line SL-1 shall not exceed 1.8 ton/mo and 18.7 ton/yr (Both Lacquer and Latex Coating). [T1]

F. Pursuant to Construction Permit # 00080079, emissions of VOM from coating Line 4 shall not exceed 3.65 ton/mo and 25.5 ton/yr. [T1]

ii. Compliance Method (Volatile Organic Material)

Monitoring

A. Pursuant to 35 IAC 218.105(a) and Section 39.5(7)(b) and (d) of the Act, testing for VOM content of representative coatings and cleanup solvents for Line 1 and Line 4 shall be performed based on the following options:

I. On an annual basis, the VOM content of representative coatings “as applied” on the coating lines shall be determined according to Method 24 and 24A of 40 CFR 60 Appendix A and the procedures of 35 IAC 218.105(a);

II. The VOM content of the cleaning solvents used on each coating line shall be tested annually according to Method 24 and 24A of 40 CFR 60 Appendix A and the procedures of 35 IAC 218.105(a) and 218.211(c): or

III. This testing may be performed by the supplier of a material provided that the supplier submits appropriate documentation for such testing to the Permittee and the Permittee’s records directly reflect the application of such material and separately account for any additions of solvent.

B. Pursuant to 218.105(c)(4)(D) and Section 39.5(7)(b) and (d) of the Act, the Permittee must verify the capture system for coating lines SL-1 and 3 meets the specifications of Permanent Total Enclosure (PTE) given in Method 204 of Appendix M of 40 CFR 51 within 5 years of the issue date of this permit and every 20 years thereafter.

C. Pursuant to 35 IAC 218.105(d)(1), for Coating Line 3 and SL-1, the control device efficiency shall be determined within five years of permit issuance and then once every five years thereafter, by simultaneously measuring the inlet and outlet gas phase VOM concentrations and gas volumetric flow rates in accordance with the gas phase test methods specified in 35 IAC 218.105(f).

D. Pursuant to 35 IAC 218.105(d)(2), for Coating Line 3 and SL-1, the owner or operator shall do the following:

I. Use continuous monitoring equipment which is installed, calibrated, maintained, and operated according to vendor specifications at all times the control device is in use. The continuous monitoring equipment must monitor the following parameter:

For each afterburner which has a catalyst bed, commonly known as a catalytic afterburner, the temperature rise across each catalytic afterburner bed. Pursuant to Section 39.5(b) and (d) of the Act, as an alternative to this requirement, the Permittee can implement a

site-specific inspection and maintenance plan for the catalytic oxidizer as specified in 40 CFR 60.3360(e)(3)(ii)(C) and (D).

II. Must install, calibrate, operate and maintain, in accordance with manufacturer's specifications, a continuous recorder on the temperature monitoring device, such as a strip chart, recorder or computer, having an accuracy of ± 1 percent of the temperature measured in degrees Celsius or ± 0.5 degree C, whichever is greater.

Testing

E. Pursuant to 35 IAC 218.211(a), the VOM content of each coating and the efficiency of each capture system and control device shall be determined by the applicable test methods and procedures specified in 35 IAC 218.105 to establish the required recordkeeping.

F. Pursuant to Section 39.5(7)(b) and (d) of the Act, the Permittee shall also comply with the requirements in Section 7.1.

Recordkeeping

G. Pursuant to 218.211(c), for Coating Line 1 and Line 4, the owner or operator shall collect and record each day the following:

I. The name and identification number of each coating as applied on each coating line;

II. The weight of VOM per volume of each coating (minus water and any compounds that are specifically exempted from the definition of VOM) as applied each day on each coating line;

III. For coating lines subject to the limitations of 35 IAC 218.204(c)(2), the weight of VOM per weight of solids (or the weight of VOM per weight of coatings, as applicable) in each coating as applied each day on each coating line

H. Pursuant to 218.211(e), for Coating Line 3 and SL-1, the owner or operator shall collect and record each day the following:

I. Control device monitoring data.

II. A log of operating time for the capture system, control device, monitoring equipment and the associated coating line.

III. A maintenance log for the capture system, control device and monitoring equipment detailing all routine and non-routine maintenance performed including dates and duration of any outages.

I. Pursuant to 39.5(7)(b) and (e) of the Act, the Permittee shall maintain records of VOM emissions including supporting calculations in tons/month and tons/year.

J. Pursuant to Sections 39.5(7)(b) and (e) of the Act, compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month average).

e. i. <u>Hazardous Air Pollutant Requirements (HAP)</u>

A. Pursuant to 40 CFR 63.3320(b),(1), (2) and (3), the coating lines are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paper and Other Web Coating Operations, 40 CFR 63, Subpart A

and JJJJ. Organic HAP emissions from the subject web coating lines at the source, shall comply with one of the emission standards below:

I. Organic HAP emissions shall be no more than 2 percent of the organic HAP applied for each month (98 percent reduction; or

II. Organic HAP emissions shall be no more than 1.6 percent of the mass of coating materials applied for each month; or

III. Organic HAP emissions shall be no more than 8 percent of the mass of coating solids applied for each month.

B. Pursuant to 40 CFR 63.3320(b)(4), if an oxidizer is used to control HAP emissions, the oxidizer shall be operated such that an outlet organic HAP concentration of no greater than 20 parts per million by volume (ppmv) by compound on a dry basis is achieved and the efficiency of the capture system is 100 percent.

C. Pursuant to 63.3342, the Permittee is subject to the general provisions in Condition 7.4, including startup, shutdown and malfunction plans (SSMP) in 40 CFR 63.6(e)(3) when a control device is used to comply with the emission standards.

ii. Periodic Monitoring Compliance Method (HAPs)

Monitoring

A. Pursuant to 40 CFR 63.3370 and Section 39.5 (b) and (d) of the Act, compliance to the limitations in Condition 4.3.2(e)(i)(A) and (B) shall be demonstrated on a monthly basis according to the provisions in 40 CFR 63.3370.

B. Pursuant to 40 CFR 63.3550(e)(1) through (8), if the Permitee is using a control device to comply, the Permitee shall install operate and maintain a continuous parameter monitoring system (CPMS) according to the following requirements:

I. Each CPMS must complete a minimum of one cycle of operation for each successive 15-minute period with a minimum of four equally spaced successive cycles of CPMS operation to have a valid hour of data.

II. Valid data shall be from at least 90 percent of the hours during which the process operated.

III. To calculate a valid hourly value, you must have at least three of four equally spaced data values from that hour from a continuous monitoring system (CMS) that is not out-of-control.

Provided all of the readings recorded in accordance with this condition clearly demonstrate continuous compliance with the 4.3.2(e)(i)(A) and (B), then the hourly average of all recorded readings is not required.

IV. The Permittee must determine the rolling 3-hour average of all recorded readings for each operating period. To calculate the average for each 3-hour averaging period, you must have at least two of three of the hourly averages for that period using only average values that are based on valid data (i.e., not from out-of-control periods).

V. The Permittee must record the results of each inspection, calibration, and validation check of the CPMS.

VI. At all times, the Permittee must maintain the monitoring system in proper working order including, but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

VII. Except for monitoring malfunctions, associated repairs, or required quality assurance or control activities (including calibration checks or required zero and span adjustments), you must conduct all monitoring at all times that the unit is operating. Data recorded during monitoring malfunctions, associated repairs, out-of-control periods, or required quality assurance or control activities shall not be used for purposes of calculating the emissions concentrations and percent reductions specified in §63.3370. You must use all the valid data collected during all other periods in assessing compliance of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring system to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

VIII. Any averaging period for which you do not have valid monitoring data and such data are required constitutes a deviation, and you must notify the Administrator in accordance with 40 CFR 63.3400(c).

C. Pursuant to 40 CFR 63.3350(e)(9)(i) and (iii), if the Permittee is using an oxidizer to comply with Conditions 4.3.2(E)(i)(A) and (B), the Permittee must comply with the following:

I. Install, calibrate, maintain, and operate temperature monitoring equipment according to the manufacturer's specifications. The calibration of the chart recorder, data logger, or temperature indicator must be verified every 3 months or the chart recorder, data logger, or temperature indicator must be replaced. You must replace the equipment whether you choose not to perform the calibration or the equipment cannot be calibrated properly.

(II) For a catalytic oxidizer, install, calibrate, operate, and maintain a temperature monitoring device equipped with a continuous recorder. The device must be capable of monitoring temperature with an accuracy of ±1 percent of the temperature being monitored in degrees Celsius or ±1 degree Celsius, whichever is greater. The thermocouple or temperature sensor must be installed in the vent stream at the nearest feasible point to the inlet and outlet of the catalyst bed. Calculate the temperature rise across the catalyst.

D. Pursuant to 40 CFR 63.3350(f)(1) and (2), if the Permittee is complying with the emission standards in 4.3.2(e)(i)(A) and (B) by the use of a capture system and control device for one or more web coating lines, you must develop a site-specific monitoring plan containing the following:

I. Identify the operating parameter to be monitored to ensure that the capture efficiency determined during the initial compliance test is maintained; and

II. Explain why this parameter is appropriate for demonstrating ongoing compliance; and

III. Identify the specific monitoring procedures.

IV. Specify the operating parameter value or range of values that demonstrate compliance with the emission standards in 40 CFR 63.3320. The specified operating parameter value or range of values must

represent the conditions present when the capture system is being properly operated and maintained.

E. Pursuant to 40 CFR 63.3350(f)(3) the Permittee must conduct all capture system monitoring in accordance with the plan.

F. Pursuant to 40 CFR 63.3350(f)(4) any deviation from the operating parameter value or range of values which are monitored according to the plan will be considered a deviation from the operating limit.

G. Pursuant to 40 CFR 63.3350(f)(5), the Permittee must review and update the capture system monitoring plan at least annually.

Testing

H. Pursuant to 40 CFR 63.3360(a) and (c), if HAP emissions are limited by HAP or VOC content of coatings, then the Permittee shall determine the organic HAP mass fraction of each coating material as-purchased pursuant to 40 CFR 63.3360(c)(1), (2) or (3) and as-applied pursuant to 40 CFR 63.3360(c)(4).

I. Pursuant to 40 CFR 63.3360(a) and (d), if HAP emissions are limited by HAP or VOC content of coatings and compliance is determined with the emission standards in Condition 4.3.2(e)(i)(A) and (B) by means other than determining the overall organic HAP control efficiency of a control device, while choosing to use the volatile organic content as a surrogate for the organic HAP content of coatings, then the Permittee shall determine the as-purchased volatile organic content and coating solids content of each coating material applied by following the procedures in 40 CFR 63.3360(d)(1) or(2) and the as-applied volatile organic content and coating solids content of each coating material by following the procedures 40 CFR 63.3360(d)(3).

J. Pursuant to 40 CFR 63.3360(a) and (e)(3)(ii), if HAP emissions are controlled by a capture and control system, control device operating limits shall be established according to 40 CFR 63.3350(e)(3)(ii)(A) and (B) or (e)(3)(ii)(C) and (D).

K. Pursuant to 40 CFR 63.3360(a) and (f), if HAP emissions are controlled by a capture and control system, capture efficiency may be determined by one of the methods at 40 CFR 63.3360(f)(1), (2) or (3).

Recordkeeping

L. Pursuant to 40 CFR 63.3410,(a)(1) and (2), each owner or operator must maintain the records monthly basis in accordance with the requirements of 40 CFR 63.10(b)(1) and (2):

I. All records used to demonstrate compliance

II. Continuous emission monitor data in accordance with the requirements of 40 CFR 63.3350(d);

III. Control device and capture system operating parameter data in accordance with the requirements of 40 CFR 63.3350(c), (e), and (f);

IV. Organic HAP content data for the purpose of demonstrating compliance in accordance with the requirements of 40 CFR 63.3360(c);

V. Volatile matter and coating solids content data for the purpose of demonstrating compliance in accordance with the requirements of 40 CFR 63.3360(d);

VI. Overall control efficiency determination using capture efficiency and control device destruction or removal efficiency test results in accordance with the requirements of 40 CFR 63.3360(e) and (f); and

VII. Material usage, organic HAP usage, volatile matter usage, and coating solids usage and compliance demonstrations using these data in accordance with the requirements of 40 CFR 63.3370(b), (c), and (d).

f. i. Operational and Production Requirements

A. Pursuant to Section 39.5(7)(a) of the Act, natural gas shall be the only fuel fired by the air heater.

B. Pursuant to Construction Permit #00080079 for coating Line 1, the usage of VOM shall not exceed 1.36 ton/mo and 10 tpn/yr. [T1]

C. Pursuant to Construction Permit #00080079 for coating Line 3 (Laquer Coating), usage shall not exceed 25,000 gal/mo and 161,180 gal/yr.

D. Pursuant to Construction Permit #00080079 for coating Line 3 (Latex Coating), usage shall not exceed the following:

I. 30,000 gal/mo and 40,200 gal/yr – Less Water

II. 95,240 gal/mo and 127,620 gal/yr – With Water

E. Pursuant to Construction Permit #05070045 for SL-1 (Lacquer Coating) [T1]:

I. The control system shall achieve at least 98 percent overall control efficiency.

II. The temperature rise across the catalyst bed of the catalytic oxidizer shall be maintained at a level that is consistent with the temperature rise at which compliance was demonstrated in the most recent compliance test. Pursuant to Section 39.5(a) of the Act, as an alternative to this requirement, the permittee can implement a site-specific inspection and maintenance plan for the catalytic oxidizer as specified in 40 CFR 60.3360(e)(3)(ii)(C) and (D).

III. The total usage of coating shall not exceed 65 ton/mo and 390 ton/yr

F. Pursuant to Construction Permit #05070045 for SL-1 (Latex Coating), the total amount of VOM in coatings applied shall not exceed 1.2 ton/mo and 12 ton/yr. [T1]

G. Pursuant to Construction Permit #00080079 for coating Line 4, the usage of VOM shall not exceed 3.65 ton/mo and 25.5 ton/yr.[T1]

H. Pursuant to 40 CFR 63.3321, for any web coating line or group of web coating lines for which an add-on control device is used the Permittee must meet the applicable operating limits specified in Table 1 of 40 CFR 63 Subpart JJJJ. See Condition 7.4. The Permittee must meet the operating limits at all times after the limits are established.

I. Pursuant to 40 CFR 63.3370 the catalytic oxidizer shall reduce organic HAPs emissions by at least 98 percent.

ii. Periodic Monitoring Compliance Method (Operational and Production Requirements)

Monitoring

A. Pursuant to 40 CFR 63.3370, the compliance procedures for use of as purchased compliant coatings, as applied compliant coatings and capture system/control device shell be demonstrated on a monthly basis.

Testing

B. Pursuant to 40 CFR 63.3321, operating limits in Table 1 of 40 CFR 63 Subpart JJJJ shall be established during performance tests according to the requirements in 40 CFR 63.3360(e).

Recordkeeping

C. Pursuant to Section 39.5(7)(b) and (e) of the Act, the Permittee shall maintain records of the type of fuel fired by the air heater.

D. Pursuant to Section 39.5(7)(b) and (e) of the Act, for Coating Line 3 and SL-1 the Permittee shall maintain records of the VOM content of the coatings used, percent by weight, by type of coating, with supporting documentation.

E. Pursuant to Section 39.5(7)(b) and (e) of the Act, the permit shall maintain records of coating usage in ton/mo, gal/mo and ton/yr, gal/yr.

F. Pursuant to Sections 39.5(7)(b) and (e) of the Act, compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month average).

G. Pursuant to Section 39.5(b) and (e) of the Act, the Permittee shall keep records of the established operating limits and the methods used to determine them.

g. i. Work Practice Requirements

A. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall maintain and operate the coating lines in a manner consistent with safety and good air pollution control practice for minimizing emissions.

ii. Compliance Method (Work Practice Requirements)

Monitoring

A. Pursuant to 40 CFR 63.3350(b), the Permittee must monitor and inspect each capture system and each control device on a monthly basis.

B. Pursuant to Section 39.5(7)(b) and (d) of the Act, the Permittee shall operate and perform preventive maintenance on each coating line and air pollution control equipment in accordance with the manufacturer(s) recommendation(s).

C. Pursuant to Sections 39.5(7)(b) and (d) of the Act, the Permittee shall perform quarterly inspections of the areas where VOM containing materials are handled and/or stored in order to maintain good work practices.

D. Pursuant to 35 IAC 218.218(a), the Permittee shall do the following:

I. Store all VOM-containing cleaning materials in closed containers;

II. Ensure that mixing and storage containers used for VOM-containing materials are kept closed at all times except when depositing or removing those materials;

III. Minimize spills of VOM-containing cleaning materials;

IV. Convey VOM-containing cleaning materials from one location to another in closed containers or pipes; and

V. Minimize VOM emissions from the cleaning of storage, mixing, and conveying equipment.

Recordkeeping

E. Pursuant to Section 39.5(7)(b) and (e) of the Act, the Permittee shall keep records of each inspection performed along with a maintenance and repair log. These records shall include, at a minimum: date and time inspections were performed, name(s) of inspection personnel, identification of equipment being inspected, findings of the inspections, operation and maintenance procedures, and a description of all maintenance and repair activities performed including if the activity resulted in a modification or reconstruction of the piece of equipment.

F. Any instances of improper use of closed containers, with descriptions of actual practice and corrective action taken, if any.

3. Non-Applicability Determinations

a. The coating lines are not subject to 40 CFR 60 Subpart VVV, Standards of Performance for Polymeric Coating of Supporting Substrates Facilities because the coating lines do not fit the definition for "polymeric coating of supporting substrates", which excludes paper, plastic film, metallic foil or metal coil.

b. The coating lines are not subject to 35 IAC Subpart G: Use of Organic Material, pursuant to 35 IAC 218.209, Exemption From General Rule on Use of Organic Material, which excludes affected coating lines from this requirement.

c. This permit is issued based on cleaning operations for the coating lines not being subject to the control requirements of 35 IAC 218.187, Other Industrial Solvent Cleaning Operations, pursuant to 35 IAC 218.187(a)(2)(B)(vii), as the lines performs paper coating and paper coating is exempted.

d. Coating lines 1 and Coating Line 4 are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources for PM and VOM, because the coating lines do not use an add-on control device to achieve compliance with an emission limitation or standard.

4. Other Requirements

As of the date of issuance of this permit, there are no other requirements that need to be included in this Condition.

5. Reporting Requirements

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act. Addresses are included in Attachment 3.

a. Prompt Reporting

i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows unless a different period is specified by a particular permit provision, i.e., NSPS or NESHAP requirement:

I. Requirements in Conditions 4.3.2(a)(i), 4.3.2(b)(i), 4.3.2(c)(i), 4.3.2(d)(i),4.3.2(e)(i) and 4.3.2(f)(i).

B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).

ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).

iii. The deviation reports shall contain at a minimum the following information:

A. Date and time of the deviation.

B. Emission unit(s) and/or operation involved.

C. The duration of the event.

D. Probable cause of the deviation.

E. Corrective actions or preventative measures taken.

4.4 Lacquer Color Matching Operations

1. Emission Units and Operations

Emission Units	*Pollutants Being Regulated*	*Original Construction Date*	*Modification/ Reconstruction Date*	*Air Pollution Control Devices or Measures*	*Monitoring Devices*
Lacquer Color Matching Operations	PM and VOM	Prior to 1992	N/A	None	None

2. Applicable Requirements

For the emission units in Condition 4.1.1 above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

a. i. Opacity Requirements

A. Pursuant to 35 IAC 212.123(a), the Permittee shall not cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to 35 IAC 212.122, except as provided for in 35 IAC 212.123(b).

ii. Compliance Method (Opacity Requirements)

Monitoring Requirements

A. Pursuant to Sections 39.5(7)(b) and (d) of the Act, at a minimum, the Permittee shall perform an observation of the facility's roof exhaust points in accordance with Method 22 for visual emissions at least once every calendar year. If visible emissions are observed, the Permittee shall take corrective action within 4 hours of such observation. Corrective action may include, but is not limited to, shut down of the printing line and/or maintenance and repair. If corrective action was taken the Permittee shall perform a follow-up observation for visible emissions in accordance with Method 22. If visible emissions continue, then measurements of opacity in accordance with Method 9 and Section 7.1 shall be conducted within 7 days in accordance with Condition 2.4.

Recordkeeping Requirements

B. Pursuant to Section 39.5(7)(b) and (e) of the Act, the Permittee shall keep records for each observation for visual emissions conducted. These records shall include, at a minimum: date and time the observation was performed, name(s) of observing personnel, identification of which equipment was observed, whether or not the equipment was running properly, the findings of the observation including the presence of any visible emissions, and a description of any corrective action taken including if the corrective action took place within 4 hours of the observation.

C. Pursuant to Section 39.5(7)(b) and (e) of the Act, the Permittee shall keep records for all opacity measurements made in accordance with USEPA Method 9.

b. i. Particulate Matter Requirements (PM)

A. Pursuant to 35 IAC 212.321(a), no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972,

at a source or premises, to exceed the allowable emission rates specified in 35 IAC 212.321(c).

ii. Compliance Method (PM Requirements)

Recordkeeping

A. Pursuant to 39.5(7)(b) and (e) of the Act, the Permittee shall keep the following records related to PM emissions:

I. Operating hours (hr/mo and hr/year) with supporting documentation.

II. Particulate matter emissions with supporting documentation.

c. i. Volatile Organic Material Requirements (VOM)

A. Pursuant to 35 IAC 218.301, the Permittee shall not cause or allow the discharge of more than 3.6 kg/hour (8 lbs/hour) of organic material into the atmosphere from each printing line, except as provided in 35 IAC 218.302, 218.303, or 218.30 4.

B. Pursuant to limits established in the source's initial CAAPP permit, based on a stack tested emission factor,the lacquer color matching operations are subject to the following: [T1]

I. Total combined emissions of the affected lacquer color matching operations shall not exceed the following limits:

Lacquer Colors Matched		VOM Usage	VOM Emissions	
(Colors/mo)	(Colors/yr)	(lb VOM/Color)	(T/mo)	(T/yr)
2,500	25,000	0.96	1.2	12.0

ii. Compliance Method (VOM Requirements)

Monitoring

A. Pursuant to Pursuant to Sections 39.5(7)(b) and (d) of the Act,compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month average).

Testing

B. Pursuant to Section 39.5(7)(b) and (d) of the Act, testing for VOM content of specific paints shall be performed based on the following options:

I. On an annual basis, the VOM content of specific paints shall be determined according to Method 24 and 24A of 40 CFR 60 Appendix A and the procedures of 35 IAC 218.105; or

II. This testing may be performed by the supplier of a material provided that the supplier submits appropriate documentation demonstrating Method 24 and 24A equivalency.

Recordkeeping

C. Pursuant to Section 39.5(7)(b) and (e) of the Act the Permittee shall maintain records of the following:

I. Amount of processed matched colors per month and per year;

II. The VOM usage for each processed match color; and

III. Total VOM emissions from affected color matching operations, in terms of tons per month and tons per year with supporting calculations.

IV. Operating hours (hours/month and hours/year)

V. Method 24 and 24A test results

3. Non-Applicability Determinations

a. Affected color matching operations are exempted from the requirements of 35 IAC Part 218, Subpart TT "Other Emission Units" because maximum theoretical emissions and potential to emit of VOM are limited to less than 25 ton/year [35 IAC 218.980(a) and (b)].

b. This permit is issued based on the affected color matching operations at the source not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources for PM or VOM, because these lines do not use an air pollution control device for controlling emissions of regulated air pollutants.

4. Other Requirements

As of the date of issuance of this permit, there are no other requirements that need to be included in this Condition.

5. Reporting Requirements

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act. Addresses are included in Attachment 3.

a. Prompt Reporting

i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows unless a different period is specified by a particular permit provision, i.e., NSPS or NESHAP requirement:

I. Requirements in Conditions 4.4.2(a)(i), 4.4.2(b)(i), and 4.4.2(c)(i).

B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).

ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).

iii. The deviation reports shall contain at a minimum the following information:

A. Date and time of the deviation.

B. Emission unit(s) and/or operation involved.

C. The duration of the event.

D. Probable cause of the deviation.

E. Corrective actions or preventative measures taken.

4.5 Natural Gas-Fired Boilers

1. Emission Units and Operations

Emission Units	*Pollutants Being Regulated*	*Original Construction Date*	*Modification/ Reconstruction Date*	*Air Pollution Control Devices or Measures*	*Monitoring Devices*
Boiler #5 (11.7 mmBTU/hr)	PM, , HAP, CO	Prior to 1980	N/A	None	None
Boiler #4 (9.2 mmBTU/hr)	PM, HAP	Prior to 1980	N/A	None	None
Boiler #1 (4.5 mmBTU/hr)	PM, HAP	Prior to 1989	N/A	None	None
Boiler #2 (4.5 mmBTU/hr)	PM, HAP	Prior to 1989	N/A	None	None

2. Applicable Requirements

For the emission units in Condition 4.5.1 above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

a. i. Opacity Requirements

A. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit.

ii. Compliance Method (Opacity Requirements)

Monitoring

A. Pursuant to Sections 39.5(7)(b) and (d) of the Act, at a minimum, the Permittee shall perform observations for opacity on the boilers in accordance with Method 22 for visible emissions at least once every calendar year. If visible emissions are observed, the Permittee shall take corrective action within 4 hours of such observation. Corrective action may include, but is not limited to, shut down of the boiler, maintenance and repair, and/or adjustment of fuel usage. If corrective action was taken, the Permittee shall perform a follow up observation for visible emissions in accordance with Method 22. If visible emissions continue, then measurements of opacity in accordance with Method 9 and Section 7.1 shall be conducted within 7 days in accordance with Condition 2.4.

Recordkeeping

B. Pursuant to Section 39.5(7)(b) and (e) of the Act, the Permittee shall keep records for each opacity observation performed. These records shall include, at a minimum: date and time the observation was performed, name(s) of observing personnel, identification of which equipment was observed, whether or not the equipment was running properly, the findings of the observation including the presence of any visible emissions, and a description of any corrective action taken including if the corrective action took place within 4 hours of the observation.

C. Pursuant to Section 39.5(7)(b) and (e) of the Act, if required, the Permittee shall keep records for all opacity measurements made in accordance with Method 9.

b. i. Carbon Monoxide Requirements (CO)

A. Pursuant to 35 IAC 216.121, no person shall cause or allow the emission of carbon monoxide (CO) into the atmosphere from any fuel combustion emission

source (Boiler 5) with actual heat input greater than 2.9 MW (10 mmbtu/hr) to exceed 200 ppm, corrected to 50 percent excess air.

ii. Compliance Method (CO Requirements)

A. Pursuant to Section 39.5(7)(b) and (e) of the Act, the Permittee shall maintain records of CO emissions from the boilers, including supporting calculations (pounds/hour).

B. The periodic monitoring required by the operational and production requirements in Condition 4.5.2(d) and the work practice requirement in Condition 4.5.2(e) also address monitoring.

c. i. Hazardous Air Pollutants (HAP)

A. Pursuant to 40 CFR 63.7485 and 40 CFR 63.7495(b), the Permittee is subject to the National Emission Standards for Hazardous Air Pollutants, Subpart DDDDD, for Major Sources: Industrial, Commercial and Institutional Boilers and Process Heaters, and must comply by January 31, 2016.

I. Pursuant to 40 CFR 63.7565 and 63.7500, the Permittee shall meet the applicable general provisions of 40 CFR 63 Subpart A (see Condition 7.2(a) and the tune-up requirements in Condition 4.5.2(e)(ii)(B), (C) and (D).

ii. Periodic Monitoring Compliance Method (HAP Requirements)

The periodic monitoring requirements sufficient to meet 39.5(7)(f) of the Act are addressed by the work practice requirements in Condition 4.4.2(d).

d. i. Operational and Production Requirements

A. Pursuant to Section 39.5(7)(a) of the Act, when the boilers are fired using natural gas, only pipeline quality natural gas shall be used.

ii. Compliance Method (Operational and Production Requirements)

Recordkeeping

A. Pursuant to Section 39.5(7)(b) and (e) of the Act, the Permittee shall maintain records of the type of fuel fired in the boiler.

e. i. Work Practice Requirements

A. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall maintain and operate the boilers in a manner consistent with safety and good air pollution control practice for minimizing emissions.

ii. Compliance Method (Work Practice Requirements)

Monitoring

A. Pursuant to Section 39.5(7)(b) and (d) of the Act, at a minimum, the Permittee shall perform monthly inspections of the boilers during the heating season.

B. Boiler 5

Pursuant to 40 CFR 63.7500(a)(1) and 40 CFR 63 Subpart DDDDD Table #3 and #4, conduct a tune-up of the boiler annually as specified in 40 CFR 63.7540

and Condition 4.5.2(e)(ii)(F). Pursuant to 40 CFR 63.7515(d),each annual tune-up must be no more than 13 months after the previous tune-up.

C. Boiler 4

Pursuant to 40 CFR 63.7500(a)(1) and 40 CFR 63 Subpart DDDDD Table 3, #2, conduct a tune-up of the boiler biennially as specified in 40 CFR 63.7540 and Condition 4.5.2(e)(ii)(F). Pursuant to 40 CFR 63.7515(d), each biennial tune-up must be no more than 25 months after the previous tune-up.

D. Boiler 1 and Boiler 2

Pursuant to 40 CFR 63.7500(e), conduct a tune up every five years as specified in 40 CFR 63.7540 and Condition 4.5.2(e)(ii)(F). The Permittee may delay the burner inspection until the next scheduled or unscheduled unit shutdown, but the burner must be inspected at least once every 72 months.

E. Pursuant to 40 CFR 63.7540(a)(13), if the boiler is not operating on the required date for a tune-up, the tune-up must be conducted within 30 calendar days of startup.

F. Pursuant to 40 CFR 63.7540(a)(11), (12) and 40 CFR 63.7540(a)(10)(i) through 63.7540(a)(10)(v), each tune-up shall consist of:

I. As applicable, inspect the burner, and clean or replace any components of the burner as necessary. (You may delay the burner inspection until the next scheduled unit shutdown. At units where entry into a piece of process equipment or into a storage vessel is required to complete the tune-up inspections, inspections are required only during planned entries into the storage vessel or process equipment).

II. Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer’s specifications, if available.

III. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly.

IV. Optimize total emissions of carbon monoxide. This optimization should be consistent with the manufacturer’s specifications, if available.

V. Measure the concentrations in the effluent stream of carbon monoxide in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made).

Recordkeeping

G. Pursuant to Section 39.5(7)(b) and (e) of the Act, the Permittee shall keep records of each inspection and tune-up performed along with a maintenance and repair log. These records shall include, at a minimum: the concentrations of CO in the effluent stream in parts per million, by volume, and oxygen in volume percent, measured before and after the tune-up, name(s) of inspection personnel, identification of equipment being inspected, findings of the inspections/tune-ups, operation and maintenance procedures, and a description of any maintenance and repair activities that resulted in a modification or reconstruction of the piece of equipment.

I. The concentrations of CO in the effluent stream in parts per million, by volume, and oxygen in volume percent, measured before and after the tune-up;

3. Non-Applicability Determinations

a. Pursuant to 40 CFR 60.40c(a), the boilers are not subject to the New Source Performance Standards (NSPS) for Small Industrial-Commercial-Institutional Steam Generating, 40 CFR Part 60 Subpart Dc, because the boilers have not been constructed, modified, or reconstructed after June 9, 1989.

b. The boilers are not subject to the National Emission Standards for Hazardous Air Pollution (NESHAP) for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR Part 63 Subpart JJJJJJ, because the boilers are not subject to that subpart as the affected boilers are considered gas-fired boilers, pursuant to 40 CFR 63.11195(e), as defined in 40 CFR 63.11237: gas-fired boilers includes any boiler that burns gaseous fuels not combined with any solid fuels, burns liquid fuel only during periods of gas curtailment, gas supply emergencies, or periodic testing on liquid fuel. Periodic testing of liquid fuel shall not exceed a combined total of 48 hours during any calendar year.

c. The boilers are not subject to 35 IAC 212.322, because the boilers are not by definition process emission units.

d. The boilers are not subject to 35 IAC 214.301, because the boilers are not by definition process emission units.

e. The boilers are not subject to 35 IAC 217.141, because the boilers do not have an actual heat input equal to or greater than 250 mmBTU/hr.

f. The boilers are not subject to the requirements of 35 IAC 218.301 and 302, Use of Organic Material, because, pursuant to 35 IAC 218.303, these regulations shall not apply to fuel combustion emission sources.

g. The boilers are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources for all regulated air pollutants, because the boilers do not use an add-on control device to achieve compliance with an emission limitation or standard.

4. Other Requirements

As of the date of issuance of this permit, there are no other requirements that need to be included in this Condition.

5. Reporting Requirements

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act. Addresses are included in Attachment 3.

a. <u>Prompt Reporting</u>

i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows unless a different period is specified by a particular permit provision, i.e., NSPS or NESHAP requirement:

I. Requirements in Conditions 4.5.2(a)(i), 4.5.2(b)(i), 4.5.2(c)(i), and 4.5.2(d)(i), and 4.5.2(e)(i).

B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).

ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).

iii. The deviation reports shall contain at a minimum the following information:

A. Date and time of the deviation.

B. Emission unit(s) and/or operation involved.

C. The duration of the event.

D. Probable cause of the deviation.

E. Corrective actions or preventative measures taken.

Section 5 – Additional Title I Requirements

1. Construction Permits – (Equipment Not Yet Built)

The Permittee shall comply with all applicable requirements of Condition 7.6 for all appropriate emission unit(s) identified in Condition 7.6 pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act. The Permittee shall certify compliance with the applicable requirements of Condition 7.6 as part of the annual compliance certification, as required by Condition 2.6(a). This permit may also have to be revised or reopened to address such new requirements in accordance to Condition 2.9 when the equipment is constructed.

Section 6 – Insignificant Activities Requirements

1. Insignificant Activities Subject to Specific Regulations

This condition is reserved for insignificant activities, as defined in 35 IAC 201.210 and 201.211, which are subject to specific standards promulgated pursuant Sections 111, 112, 165, or 173 of the Clean Air Act, see Sections 9.1(d) and 39.5(6)(a) of the Act. As of the date of issuance of this permit, there are no such insignificant activities present at the source.

2. Insignificant Activities in 35 IAC 201.210(a)

In addition to any insignificant activities identified in Condition 6.1, the following additional activities at the source constitute insignificant activities pursuant to 35 IAC 201.210 and 201.211:

Insignificant Activity	*Number of Units*	*Insignificant Activity Category*
Mixing of Latex Coating, Propane-fired forklifts, Clear Coating Application-UV Cu red	6	35 IAC 201.210(a)(1) and 201.211

Insignificant Activity	*Number of Units*	*Insignificant Activity Category*
2-web slicing machines 6-slitting machines 1-roll rewinding machines 5-Rewinding Roll Table Machine 1-stitchers 1-Die Cutter PMC 1-large sheet cutting machine 1-small slitting machine 5-hole punchers 2- hole dtilling machines 1-Tabber 2-fabric cutters 3-Die Cutter 4-paper cutters 1-Corner Cie Cutter 1-Collaters- 26 pocket 1-Collater -23 pocket 1-Collater -13 pocket 7-16 inch mounting machines 4-large jersey mounting machine 16-production assemble-water-based adhesives 2-production assembly-water based adhesives w/printing 6-printing UV cured 11-folders 1-small laminating machine 2-small baggers 1-product bar code laser printer 5-web laminating machines 1-Hamada printing machine 1-noipson DigiFlex Black and White Digital Printer 1-nipson Plate machines 1-Flexo Plate Machine 1-runner cutter 1-sample cutter 1-die cutters 48-Paint Pumping systems 1-latex paint color match systems 6-Latex Paint Color Match System 6-coating and waste storage areas 2-Trash Compactor 3-Electric Pallet Jacks 6-Electric forklifts 6-battery charging stations 10-air compressors 15-vacuum pumps 1-Vacuum Pump fabric Filter Misc Maintenance Machines Misc Wood Product Tray machines	n/a	35 IAC 201.210(a)(2) or (a)(3)
Direct combustion units used for comfort heating and fuel combustion emission units as further detailed in 35 IAC 201.210(a)(4).	15	35 IAC 201.210(a)(4)

3. Insignificant Activities in 35 IAC 201.210(b)

Pursuant to 35 IAC 201.210, the source has identified insignificant activities as listed in 35 IAC 201.210(b)(1) through (28) as being present at the source. The source is not required to individually list the activities.

4. Applicable Requirements

Insignificant activities in Conditions 6.1 and 6.2 are subject to the following general regulatory limits notwithstanding status as insignificant activities. The Permittee shall comply with the following requirements, as applicable:

a. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to 35 IAC 212.122, except as provided in 35 IAC 212.123(b).

b. Pursuant to 35 IAC 212.321 (see Conditions 7.2(a)), no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units at a source or premises, exceed the allowable emission rates specified 35 IAC 212.321 or 212.322 and 35 IAC Part 266.

c. Pursuant to 35 IAC 214.301, no person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission source to exceed 2,000 ppm, except as provided in 35 IAC Part 214.

d. Pursuant to 35 IAC 218.301, no person shall cause or allow the discharge of more than 8 lbs/hr of organic material into the atmosphere from any emission source, except as provided in 35 IAC 218.302, 218.303, 218.304 and the following exception: If no odor nuisance exists the limitation of 35 IAC 215 Subpart K shall apply only to photochemically reactive material.

e. Pursuant to 35 IAC 218.122(b), no person shall cause or allow the loading of any organic material into any stationary tank having a storage capacity of greater than 250 gal, unless such tank is equipped with a permanent submerged loading pipe, submerged fill, or an equivalent device approved by the IEPA according to 35 IAC Part 201 or unless such tank is a pressure tank as described in 35 IAC 215.121(a) or is fitted with a recovery system as described in 35 IAC 215.121(b)(2). Exception as provided in 35 IAC 218.122(c): If no odor nuisance exists the limitations of 35 IAC 215.122 shall only apply to the loading of volatile organic liquid with a vapor pressure of 2.5 psia or greater at 70°F.

f. Pursuant to 35 IAC 218.204(c), no owner or operator of a paper coating line shall apply at any time any coating (e.g., glue) in which the VOM content exceeds the emission limitations, as follows:

kg VOM/kg (lb VOM/lb) solids applied	kg VOM/kg (lb VOM/lb) coatings applied
0.40	0.08

5. Compliance Method

Pursuant to Section 39.5(7)(b) of the Act, the source shall maintain records of the following items for the insignificant activities in Conditions 6.1 and 6.2:

a. List of all insignificant activities, including insignificant activities added as specified in Condition 6.6, the categories the insignificant activities fall under, and supporting calculations as needed for any insignificant activities listed in 35 IAC 201.210(a)(1) through (3).

b. Potential to emit emission calculations before any air pollution control device for any insignificant activities listed in 35 IAC 201.210(a)(1) through (3).

6. Notification Requirements for Insignificant Activities

The source shall notify the IEPA accordingly to the addition of insignificant activities:

a. Notification 7 Days in Advance

i. Pursuant to 35 IAC 201.212(b), for the addition of an insignificant activity that would be categorized under 35 IAC 201.210(a)(1) and 201.211 and is not currently identified in Conditions 6.1 or 6.2, a notification to the IEPA Permit Section 7

days in advance of the addition of the insignificant activity is required. Addresses are included in Attachment 3. The notification shall include the following pursuant to 35 IAC 201.211(b):

A. A description of the emission unit including the function and expected operating schedule of the unit.

B. A description of any air pollution control equipment or control measures associated with the emission unit.

C. The emissions of regulated air pollutants in lb/hr and ton/yr.

D. The means by which emissions were determined or estimated.

E. The estimated number of such emission units at the source.

F. Other information upon which the applicant relies to support treatment of such emission unit as an insignificant activity.

ii. Pursuant to 35 IAC 201.212(b), for the addition of an insignificant activity that would be categorized under 35 IAC 201.210(a)(2) through 201.210(a)(18) and is not currently identified in Conditions 6.1 or 6.2, a notification to the IEPA Permit Section 7 days in advance of the addition of the insignificant activity is required. Addresses are included in Attachment 3.

iii. Pursuant to Sections 39.5(12)(a)(i)(b) and 39.5(12)(b)(iii) of the Act, the permit shield described in Section 39.5(7)(j) of the Act (see Condition 2.7) shall not apply to any addition of an insignificant activity noted above.

b. Notification Required at Renewal

Pursuant to 35 IAC 201.212(a) and 35 IAC 201.146(kkk), for the addition of an insignificant activity that would be categorized under 35 IAC 201.210(a) and is currently identified in Conditions 6.1 or 6.2, a notification is not required until the renewal of this permit.

c. Notification Not Required

Pursuant to 35 IAC 201.212(c) and 35 IAC 201.146(kkk), for the addition of an insignificant activity that would be categorized under 35 IAC 201.210(b) as describe in Condition 6.3, a notification is not required.

Section 7 – Other Requirements

1. Testing

a. Pursuant to Section 39.5(7)(a) of the Act, a written test protocol shall be submitted at least sixty (60) days prior to the actual date of testing, unless it is required otherwise in applicable state or federal statutes. The IEPA may at the discretion of the Compliance Section Manager (or designee) accept protocol less than 60 days prior to testing provided it does not interfere with the IEPA's ability to review and comment on the protocol and does not deviate from the applicable state or federal statutes. The protocol shall be submitted to the IEPA, Compliance Section and IEPA, Stack Test Specialist for its review. Addresses are included in Attachment 3. This protocol shall describe the specific procedures for testing, including as a minimum:

i. The name and identification of the emission unit(s) being tested.

ii. Purpose of the test, i.e., permit condition requirement, IEPA or USEPA requesting test.

iii. The person(s) who will be performing sampling and analysis and their experience with similar tests.

iv. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the emission unit and any control equipment will be determined.

v. The specific determinations of emissions and operation which are intended to be made, including sampling and monitoring locations.

vi. The test method(s) that will be used, with the specific analysis method, if the method can be used with different analysis methods. Include if emission tests averaging of 35 IAC 283 will be used.

vii. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with detailed justification. This shall be included as a waiver of the test procedures. If a waiver has already been obtained by the IEPA or USEPA, then the waiver shall be submitted.

viii. Any proposed use of an alternative test method, with detailed justification. This shall be included as a waiver of the test procedures. If a waiver has already been obtained by the IEPA or USEPA, then the waiver shall be submitted.

ix. Sampling of materials, QA/QC procedures, inspections, etc.

b. The IEPA, Compliance Section shall be notified prior to these tests to enable the IEPA to observe these tests pursuant to Section 39.7(a) of the Act as follows:

i. Notification of the expected date of testing shall be submitted in writing a minimum of thirty (30) days prior to the expected test date, unless it is required otherwise in applicable state or federal statutes.

ii. Notification of the actual date and expected time of testing shall be submitted in writing a minimum of five (5) working days prior to the actual date of the test. The IEPA may at its discretion of the Compliance Section Manager (or designee) accept notifications with shorter advance notice provided such notifications will not interfere with the IEPA's ability to observe testing.

c. Copies of the Final Report(s) for these tests shall be submitted to the IEPA, Compliance Section within fourteen (14) days after the test results are compiled and finalized but no later than ninety (90) days after completion of the test, unless it is required

otherwise in applicable state or federal statutes or the IEPA may at the discretion of the Compliance Section Manager (or designee) an alternative date is agreed upon in advance pursuant to Section 39.7(a) of the Act. The Final Report shall include as a minimum:

i. General information including emission unit(s) tested.

ii. A summary of results.

iii. Discussion of conditions during each test run (malfunction/breakdown, startup/shutdown, abnormal processing, etc.).

iv. Description of test method(s), including description of sampling points, sampling train, analysis equipment, and test schedule.

v. Detailed description of test conditions, including:

A. Process information, i.e., mode(s) of operation, process rate, e.g. fuel or raw material consumption.

B. Control equipment information, i.e., equipment condition and operating parameters during testing.

C. A discussion of any preparatory actions taken, i.e., inspections, maintenance and repair.

vi. Data and calculations, including copies of all raw data sheets and records of laboratory analyses, sample calculations, and data on equipment calibration.

vii. An explanation of any discrepancies among individual tests or anomalous data.

viii. Results of the sampling of materials, QA/QC procedures, inspections, etc.

ix. Discussion of whether protocol was followed and description of any changes to the protocol if any occurred.

x. Demonstration of compliance showing whether test results are in compliance with applicable state or federal statutes.

d. Copies of all test reports and other test related documentation shall be kept on site as required by Condition 2.5(b) pursuant to Section 39.5(7)(e)(ii) of the Act.

2. PM Process Weight Rate Requirements

a. New Process Emission Units – 35 IAC 212.321

New Process Emission Units For Which Construction or Modification Commenced On or After April 14, 1972 [35 IAC 212.321].

i. No person shall cause or allow the emission of PM into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of PM from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in 35 IAC 212.321(c). See Condition 7.2(a)(iii) below. [35 IAC 212.321(a)]

ii. Interpolated and extrapolated values of the data in 35 IAC 212.321(c) shall be determined by using the equation [35 IAC 212.321(b)]:

$$E = A(P)^B$$

Where:

P = Process weight rate (T/hr)
E = Allowable emission rate (lbs/hr)

A. Process weight rates of less than 450 T/hr:

A = 2.54
B = 0.53

B. Process weight rates greater than or equal to 450 T/hr:

A = 24.8
B = 0.16

iii. Limits for New Process Emission Units [35 IAC 212.321(c)]:

P (T/hr)	E (lbs/hr)	P (T/hr)	E (lbs/hr)
0.05	0.55	25.00	14.00
0.10	0.77	30.00	15.60
0.20	1.10	35.00	17.00
0.30	1.35	40.00	18.20
0.40	1.58	45.00	19.20
0.50	1.75	50.00	20.50
0.75	2.40	100.00	29.50
1.00	2.60	150.00	37.00
2.00	3.70	200.00	43.00
3.00	4.60	250.00	48.50
4.00	5.35	300.00	53.00
5.00	6.00	350.00	58.00
10.00	8.70	400.00	62.00
15.00	10.80	450.00	66.00
20.00	12.50	500.00	67.00

3. Emissions Reduction Market System (ERMS) Requirements

a. Pursuant to 35 IAC Part 205, this source is considered a "participating source" for purposes of the ERMS.

b. Obligation to Hold Allotment Trading Units (ATUs)

i. Pursuant to 35 IAC 205.150(c)(1) and 35 IAC 205.720, and as further addressed by Condition 7.3(g), as of December 31 of each year, this source shall hold ATUs in its account in an amount not less than the ATU equivalent of its VOM emissions during the preceding seasonal allotment period (May 1 – September 30), not including VOM emissions from the following, or the source shall be subject to "emissions excursion compensation," as described in Condition 7.3(d):

A. VOM emissions from insignificant emission units and activities as identified in Section 6 of this permit, in accordance with 35 IAC 205.220.

B. Excess VOM emissions associated with startup, malfunction, or breakdown of an emission unit as authorized in Section 4 of this permit, in accordance with 35 IAC 205.225.

C. Excess VOM emissions to the extent allowed by a Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3).

D. Excess VOM emissions that are a consequence of an emergency as approved by the IEPA, pursuant to 35 IAC 205.750.

E. VOM emissions from certain new and modified emission units as addressed by Condition 7.3(g)(ii), if applicable, in accordance with 35 IAC 205.320(f).

ii. In accordance with 35 IAC 205.150(c)(2), notwithstanding the Condition 7.3(b)(i) above, if a source commences operation of a major modification, pursuant to 35 IAC Part 203, the source shall hold ATUs in an amount not less than 1.3 times its seasonal VOM emissions attributable to such major modification during the seasonal allotment period, determined in accordance with the construction permit for such major modification or applicable provisions in Section 4 of this permit.

c. Market Transactions

i. As specified in 35 IAC 205.610(a), the source shall apply to the IEPA for and obtain authorization for a Transaction Account prior to conducting any market transactions.

ii. Pursuant to 35 IAC 205.610(b), the Permittee shall promptly submit to the IEPA any revisions to the information submitted for its Transaction Account.

iii. Pursuant to 35 IAC 205.620(a), the source shall have at least one account officer designated for its Transaction Account.

iv. Any transfer of ATUs to or from the source from another source or general participant must be authorized by a qualified Account Officer designated by the source and approved by the IEPA, in accordance with 35 IAC 205.620, and the transfer must be submitted to the IEPA for entry into the Transaction Account database.

d. Emissions Excursion Compensation

Pursuant to 35 IAC 205.720, if the source fails to hold ATUs in accordance with Condition 7.3(b), it shall provide emissions excursion compensation in accordance with the following:

i. Upon receipt of an Excursion Compensation Notice issued by the IEPA, the source shall purchase ATUs from the ACMA in the amount specified by the notice, as follows:

A. The purchase of ATUs shall be in an amount equivalent to 1.2 times the emissions excursion; or

B. If the source had an emissions excursion for the seasonal allotment period immediately before the period for the present emissions excursion, the source shall purchase ATUs in an amount equivalent to 1.5 times the emissions excursion.

ii. If requested in accordance with paragraph 7.3(d)(iii) below or in the event that the ACMA balance is not adequate to cover the total emissions excursion amount, the IEPA will deduct ATUs equivalent to the specified amount or any remaining portion thereof from the ATUs to be issued to the source for the next seasonal allotment period.

iii. Pursuant to 35 IAC 205.720(c), within 15 days after receipt of an Excursion Compensation Notice, the Owner or Operator may request that ATUs equivalent to the amount specified be deducted from the source's next seasonal allotment by the IEPA, rather than purchased from the ACMA.

e. Quantification of Seasonal VOM Emissions

i. Pursuant to 35 IAC 205.315(b), the methods and procedures specified in Sections 3 and 4 of this permit for determining VOM emissions and compliance with VOM emission limitations shall be used for determining seasonal VOM emissions for purposes of the ERMS, with the following exceptions:

No exceptions

ii. In accordance with 35 IAC 205.750, the Permittee shall report emergency conditions at the source to the IEPA if the Permittee intends to deduct VOM emissions in excess of the technology-based emission rates normally achieved that are attributable to the emergency from the source's seasonal VOM emissions for purposes of the ERMS. These reports shall include the information specified by 35 IAC 205.750(a), and shall be submitted in accordance with the following:

A. An initial emergency conditions report within two days after the time when such excess emissions occurred due to the emergency.

B. A final emergency conditions report, if needed to supplement the initial report, within 10 days after the conclusion of the emergency.

f. Annual Account Reporting

i. Pursuant to 35 IAC 205.300, for each year in which the source is operational, the Permittee shall submit, as a component of its Annual Emissions Report, seasonal VOM emissions information to the IEPA for the seasonal allotment period. This report shall include the following information:

A. Actual seasonal emissions of VOM from the source.

B. A description of the methods and practices used to determine VOM emissions, as required by this permit, including any supporting documentation and calculations.

C. A detailed description of any monitoring methods that differ from the methods specified in this permit, as provided in 35 IAC 205.337.

D. If a source has experienced an emergency, as provided in 35 IAC 205.750, the report shall reference the associated emergency conditions report that has been approved by the IEPA.

E. If a source's baseline emissions have been adjusted due to a Variance, Consent Order, or CAAPP permit Compliance Schedule, as provided for in 35 IAC 205.320(e)(3), the report shall provide documentation quantifying the excess VOM emissions during the season that were allowed by the Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3).

F. If a source is operating a new or modified emission unit for which three years of operational data is not yet available, as specified in 35 IAC 205.320(f), the report shall specify seasonal VOM emissions attributable to the new emission unit or the modification of the emission unit.

ii. This report shall be submitted by November 30 of each year, for the preceding seasonal allotment period.

g. Allotment of ATUs to the Source

i. A. The allotment of ATUs to this source is 391 ATUs per seasonal allotment period. Per consent agreement between IEPA and Color Communications, Inc. the source agreed to an annual set aside of 185 ATU's each year. The resulting available seasonal allotment for this source is 206 ATU's. These annual allotments that are set aside are removed automatically from the source's account.

B. The original allotment of ATUs reflects the IEPA's determination that the source's baseline emissions were 44.3959 tons per season.

C. The source's original allotment reflects 88% of the baseline emissions (12% reduction), except for the VOM emissions from specific emission units excluded from such reduction, pursuant to 35 IAC 205.405, including units complying with MACT or using BAT, as identified in Condition 7.3(i) of this permit.

D. ATUs will be issued to the source's Transaction Account by the IEPA annually. These ATUs will be valid for the seasonal allotment period following issuance and, if not retired in this season, the next seasonal allotment period.

E. Condition 7.3(g)(i)(A) becomes effective beginning in the seasonal allotment period following the initial issuance of ATU's by the Illinois EPA into the Transaction Account for the Source.

ii. Contingent Allotments for New or Modified Emission Units

The source was not issued a construction permit prior to January 1, 1998 for the following new or modified emission units:

Emission Unit	*Construction Permit No.*	*Date Issued*
Coating Spray Line 2	12060025	2014
Coating Spray Line 1	05070045	2005
Lithographic Printing Line #2	04070048	2004
Coating line 4 (modification)	03040043	2003

In accordance with 35 IAC Part 205, for the above referenced emission units, the source is required to hold the appropriate amount of ATUs for these emission units.

iii. Notwithstanding the above, part or all of the above ATUs will not be issued to the source in circumstances as set forth in 35 IAC Part 205, including:

A. Transfer of ATUs by the source to another participant or the ACMA, in accordance with 35 IAC 205.630.

B. Deduction of ATUs as a consequence of emissions excursion compensation, in accordance with 35 IAC 205.720.

C. Transfer of ATUs to the ACMA, as a consequence of shutdown of the source, in accordance with 35 IAC 205.410.

h. Recordkeeping for ERMS

Pursuant to 35 IAC 205.700(a), the Permittee shall maintain copies of the following documents as its Compliance Master File for purposes of the ERMS:

i. Seasonal component of the Annual Emissions Report.

ii. Information on actual VOM emissions, as specified in detail in Sections 3 and 4 of this permit and Condition 7.3(e)(i).

iii. Any transfer agreements for the purchase or sale of ATUs and other documentation associated with the transfer of ATUs.

i. Exclusions from Further Reductions

i. A. Pursuant to 35 IAC 205.405(a), VOM emissions from the following emission units shall be excluded from the VOM emissions reductions requirements specified in 35 IAC 205.400(c) and (e) as long as such emission units continue to satisfy the following:

I. Emission units that comply with any NESHAP or MACT standard promulgated pursuant to the CAA.

II. Direct combustion emission units designed and used for comfort heating purposes, fuel combustion emission units, and internal combustion engines.

III. An emission unit for which a LAER demonstration has been approved by the IEPA on or after November 15, 1990.

B. Pursuant to 35 IAC 205.405(a) and (c), the source has demonstrated in its ERMS application and the IEPA has determined that the following emission units qualify for exclusion from further reductions because they meet the criteria as indicated above:
Natural Gas-fired boilers and ovens

ii. A. Pursuant to 35 IAC 205.405(b), VOM emissions from emission units using BAT for controlling VOM emissions shall not be subject to the VOM emissions reductions requirement specified in 35 IAC 205.400(c) or (e) as long as such emission unit continues to use such BAT.

B. Pursuant to 35 IAC 205.405(b) and (c), the source has demonstrated in its ERMS application and the IEPA has determined that the following emission units qualify for exclusion from further reductions because these emission units use BAT for controlling VOM emissions as indicated above:
None

4. 40 CFR 63 Subpart A Requirements (NESHAP)

a. 40 CFR 63 Subpart A and JJJJ – National Emission Standards for Hazardous Air Pollutants for Major Sources: Paper and Other Web Coating

Pursuant to 40 CFR 63 Subpart A and JJJJ, the Permittee shall comply with the following applicable General Provisions as indicated:

Table 2 to Subpart JJJJ of Part 63—Applicability of 40 CFR Part 63 General Provisions to Subpart JJJJ

General provisions reference	Applicable to subpart JJJJ	Explanation
§63.1(a)(1)-(4)	Yes.	
§63.1(a)(5)	No	Reserved.
§63.1(a)(6)-(8)	Yes.	
§63.1(a)(9)	No	Reserved.
§63.1(a)(10)-(14)	Yes.	
§63.1(b)(1)	No	Subpart JJJJ specifies applicability.
§63.1(b)(2)-(3)	Yes.	
§63.1(c)(1)	Yes.	
§63.1(c)(2)	No	Area sources are not subject to emission standards of subpart JJJJ.
§63.1(c)(3)	No	Reserved.
§63.1(c)(4)	Yes.	
§63.1(c)(5)	Yes.	
§63.1(d)	No	Reserved.
§63.1(e)	Yes.	
§63.1(e)(4)	No.	
§63.2	Yes	Additional definitions in subpart JJJJ.
§63.3(a)-(c)	Yes.	
§63.4(a)(1)-(3)	Yes.	
§63.4(a)(4)	No	Reserved.
§63.4(a)(5)	Yes.	
§63.4(b)-(c)	Yes.	
§63.5(a)(1)-(2)	Yes.	
§63.5(b)(1)	Yes.	
§63.5(b)(2)	No	Reserved.
§63.5(b)(3)-(6)	Yes.	
§63.5(c)	No	Reserved.

§63.5(d)	Yes.	
§63.5(e)	Yes.	
§63.5(f)	Yes.	
§63.6(a)	Yes	Applies only when capture and control system is used to comply with the standard.
§63.6(b)(1)-(5)	No	
§63.6(b)(6)	No	Reserved.
§63.6(b)(7)	Yes.	
§63.6(c)(1)-(2)	Yes.	
§63.6(c)(3)-(4)	No	Reserved.
§63.6(c)(5)	Yes.	
§63.6(d)	No	Reserved.
§63.6(e)	Yes	Provisions pertaining to SSMP, and CMS do not apply unless an add-on control system is used to comply with the emission limitations.
§63.6(f)	Yes.	
§63.6(g)	Yes.	
§63.6(h)	No	Subpart JJJJ does not require continuous opacity monitoring systems (COMS).
§63.6(i)(1)-(14)	Yes.	
§63.6(i)(15)	No	Reserved.
§63.6(i)(16)	Yes.	
§63.6(j)	Yes.	
§63.7	Yes.	
§63.8(a)(1)-(2)	Yes.	
§63.8(a)(3)	No	Reserved.
§63.8(a)(4)	No.	
§63.8(b)	Yes.	
§63.8(c)(1)-(3)	Yes	§63.8(c)(1)(i) & (ii) only apply if you use capture and control systems and are required to have a start-up, shutdown, and malfunction plan.
§63.8(c)(4)	Yes.	
§63.8(c)(5)	No	Subpart JJJJ does not require COMS.
§63.8(c)(6)-(c)(8)	Yes	Provisions for COMS are not applicable.
§63.8(d)-(f)	Yes	§63.8(f)(6) only applies if you use CEMS.
§63.8(g)	Yes	Only applies if you use CEMS.
§63.9(a)	Yes.	

§63.9(b)(1)	Yes.	
§63.9(b)(2)	Yes	Except §63.3400(b)(1) requires submittal of initial notification for existing affected sources no later than 1 year before compliance date.
§63.9(b)(3)-(5)	Yes.	
§63.9(c)-(e)	Yes.	
§63.9(f)	No	Subpart JJJJ does not require opacity and visible emissions observations.
§63.9(g)	Yes	Provisions for COMS are not applicable.
§63.9(h)(1)-(3)	Yes.	
§63.9(h)(4)	No	Reserved.
§63.9(h)(5)-(6)	Yes.	
§63.9(i)	Yes.	
§63.9(j)	Yes.	
§63.10(a)	Yes.	
§63.10(b)(1)-(3)	Yes	§63.10(b)(2)(i) through (v) only apply if you use a capture and control system.
§63.10(c)(1)	Yes.	
§63.10(c)(2)-(4)	No	Reserved.
§63.10(c)(5)-(8)	Yes.	
§63.10(c)(9)	No	Reserved.
§63.10(c)(10)-(15)	Yes.	
§63.10(d)(1)-(2)	Yes.	
§63.10(d)(3)	No	Subpart JJJJ does not require opacity and visible emissions observations.
§63.10(d)(4)-(5)	Yes.	
§63.10(e)(1)-(2)	Yes	Provisions for COMS are not applicable.
§63.10(e)(3)-(4)	No.	
§63.10(f)	Yes.	
§63.11	No.	
§63.12	Yes.	
§63.13	Yes.	
§63.14	Yes	Subpart JJJJ includes provisions for alternative ASME test methods that are incorporated by reference.
§63.15	Yes.	

Table 1 to Subpart JJJJ of Part 63—Operating Limits if Using Add-On Control Devices and Capture System

If you are required to comply with operating limits by §63.3321, you must comply with the applicable operating limits in the following table:

For the following device:	**You must meet the following operating limit:**	**And you must demonstrate continuous compliance with operating limits by:**
1. Thermal oxidizer	a. The average combustion temperature in any 3-hour period must not fall below the combustion temperature limit established according to §63.3360(e)(3)(i)	i. Collecting the combustion temperature data according to §63.3350(e)(9); ii. Reducing the data to 3-hour block averages; and iii. Maintain the 3-hour average combustion temperature at or above the temperature limit.
2. Catalytic oxidizer	a. The average temperature at the inlet to the catalyst bed in any 3-hour period must not fall below the combustion temperature limit established according to §63.3360(e)(3)(ii)	i. Collecting the catalyst bed inlet temperature data according to §63.3350(e)(9); ii. Reducing the data to 3-hour block averages; and iii. Maintain the 3-hour average catalyst bed inlet temperature at or above the temperature limit.
	b. The temperature rise across the catalyst bed must not fall below the limit established according to §63.3360(e)(3)(ii), or as an alternative to this requirement, the Permittee canimplement a site specific inspection and maintenance plan for the catalytic oxidizer as specified in 40 CFR 60.3360(e)(3)(ii)(C) and (D).	i. Collecting the catalyst bed inlet and outlet temperature data according to §63.3350(e)(9); ii. Reducing the data to 3-hour block averages; and iii. Maintain the 3-hour average temperature rise across the catalyst bed at or above the limit; or iv.as an alternative to iii. maintain site specificinspection and maintenance plan per 40 CFR 60.3360(e)(3)(ii)(C) and (D).
3. Emission capture system	Submit monitoring plan to the Administrator that identifies operating parameters to be monitored according to §63.3350(f)	Conduct monitoring according to the plan (§63.3350(f)(3)).

Table 7.5.1 – CAM Plan

Emission Unit Section:	4.3
PSEU Designation:	Coating Lines #SL-1 and #3 with Catalytic Oxidizer
Pollutant:	VOM

Indicators:	#1) Inlet & Outlet Catalytic Oxidizer Temperature	#2) PTE Differential Presure
General Criteria		
The Monitoring Approach Used to Measure the Indicators:	Thermocouples locatedin the inlet and outlet of oxidizer. Continuous temp monitoring.	Differential pressure monitored at Line 3 PTE and at SL-1 PTE.
The Indicator Range Which Provides a Reasonable Assurance of Compliance:	Inlet temperature > 599 degree F as established during performance test	Negative differential pressure of at least 0.007 inches of water
Quality Improvement Plan (QIP) Threshold Levels:	Greater than 5% of operating timewith inlet temperature <600 degree F	Greater than 5% of operating time when PTE differential not at 0.007 inchesof water.
Performance Criteria		
The Specifications for Obtaining Representative Data:	Thermocouple and temperature controller operated to monitor temp	Manometer installed at central location within PTE
Verification Procedures to Confirm the Operational Status of the Monitoring:	Quarterly and annual inspections per manufacturer's recommendations	Quarterly and annual inspections per manufacturer's recommendations
Quality Assurance and Quality Control (QA/QC) Practices that Ensure the Validity of the Data:	QA/QC performed to demonstrate operation within manufacturer specifications	QA/QC performed to demonstrate operation within manufacturer specifications
The Monitoring Frequency:	Continuous	Continuous
The Data Collection Procedures That Will Be Used:	Electronic data acquisition and handling system.	Electronic data acquisition and handling system
The Data Averaging Period For Determining Whether an Excursion or Exceedance Has Occurred:	15 min. avgs, combined as a valid 1-hr avg, 3 consecutive 1-hr values combined 3-hr avg.	15 min. avg. combined as a valid 1-hr avg

6. Construction Permits

For spray coating line 2, when constructed, and for Title 1 limits associated to spray coating line 2, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

a. Construction Permit #12060025 (Equipment (Coating line #2) Not Yet Constructed) [T1]

Pursuant to Construction Permit # 12060025, the Permittee is hereby granted to the above-designated Permittee to CONSTRUCT emission source(s) and/or air pollution control equipment consisting of a paper web spray line and a regenerative thermal oxidizer, as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

1.0 Unit Specific Conditions

1.1 Paper Coating Line

1.1.1 Description

a. This permit authorizes the construction of a multi-station coating line ("Spray Line 2") that would apply various coatings to a paper web.

Cleanup of this new coating line will be conducted for internal coating supply piping and tubing systems and the various coating storage and application components. VOM-exempt compounds will be used for cleanup.

b. This revised permit also authorizes the construction of a permanent total enclosure (PTE) and regenerative thermal oxidizer (RTO) to control emissions of Spray Line 2 and a modification to Spray Line 2 for the application of lacquer-based coatings with emissions being controlled, with increases in the permitted usage of coatings and emissions of the line.

c. With this revised permit, Spray Line 2 will have two modes of operation:

i. Mode 1: Compliance based on control of emissions with PTE and RTO.

ii. Mode 2: Compliance based on VOM content of coatings, with emissions directly to the atmosphere.

1.1.2 List of Emission Units

Emission Unit	Description	Mode of Operation	Emission Control Equipment
Spray Line 2 SL-2	Multi-Station Paper Web Coating Line with a roll coater (primer), three spray coating stations each with a heated air flash tunnel, a roll coater (clear coating) with UV or heated air curing, and an adhesive laminator (plastic backing)	Mode 1 – Lacquer Coating	Permanent Total Enclosure and RTO
		Mode 2 – Compliant Latex Coating	None

1.1.3 Applicable Emission Standards

a. The “affected line” for the purpose of this permit is the spray line described in Conditions 1.1.1 and 1.1.2.

b. The affected line is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paper and Other Web Coating, 40 CFR 63, Subpart JJJJ. Organic HAP emissions from the subject web coating lines at the source, including the affected line shall comply with one of the emission standards below, pursuant to 40 CFR 63.3320. The Permittee shall demonstrate compliance with these standards using the appropriate procedures in 40 CFR 63.3370.

   i. Organic HAP emissions shall be no more than 2 percent of the organic HAP applied for each month (98 percent reduction [40 CFR 63.3320(b)(1)];

   ii. Organic HAP emissions shall be no more than 1.6 percent of the mass of coating materials applied for each month [40 CFR 63.3320(b)(2)]; or

   iii. Organic HAP emissions shall be no more than 8 percent of the mass of coating solids applied for each month [40 CFR 63.3320(b)(3)].

   Note: When an oxidizer is used to control organic HAP emissions, the oxidizer could also be operated such that an outlet organic HAP concentration of no greater than 20 parts per million by volume (ppmv) by compound on a dry basis is achieved and the efficiency of the capture system is 100 percent [40 CFR 63.3320(b)(4)].

c. When in Mode 1, the affected line is subject to 35 IAC 218.207(a) and (c), which sets alternative emission limitations for coating lines complying with 35 IAC Part 218, Subpart F by means of add-on control equipment and provides that any owner or operator of a coating line subject to 35 IAC 218.204(c) may comply with 35 IAC 218.207, if:

   i. A capture system and control device are operated at all times the coating line is in operation.

   ii. The capture system and control device for the affected line shall provide at least 81 percent reduction in the overall emissions of volatile organic material (VOM) from the coating line and the oxidizer has a 90 destruction efficiency [35 IAC 218.207(b)(1)].

d. i. When in Mode 2 (i.e., the affected line is not in Mode 1) the affected line is subject to 35 IAC 218.204(c), which generally provides that no owner or operator of a paper coating line, other than a line that is applying pressure sensitive tape or label surface coatings, shall apply at any time any coating in which the volatile organic material (VOM) content exceeds one of the following limitations, as applied at each coating applicator. Analysis of coating to demonstrate compliance with these limits shall be conducted using the applicable coating analysis test methods and procedures specified in 35 IAC 218.105(a).

      A. 0.40 lb VOM/lb solids applied (0.40 kg VOM/kg solids applied); or

      B. 0.08 lb VOM/lb coating applied (0.08 kg VOM/kg coating applied).

ii. As an alternative to compliance with 35 IAC 218.204(c), as the affected line includes “coating lines” as defined by 35 IAC 211.1230(b) that would apply multiple coatings during the same day (e.g., the combination of the primer and three spray coating stations on the affected line), each such coating line may comply with the requirements of 35 IAC 218.205(j), which provides that a paper coating line may comply with the applicable VOM limitations of 35 IAC 218.204(c) based on the daily-weighted average VOM content of the coatings that are applied. For this purpose, until 35 IAC Part 211 or Part 218 is revised to set forth the calculations to be used to determine the daily-weighted average VOM content of the coatings applied on a coating line in the terms of the limitations for paper coating, such calculations shall be made in a manner that is consistent with Attachment 1.

Note: Pursuant to 35 IAC 218.205(j)(2), if the affected coating line applies coatings subject to more than one numerical emission limitation in 35 IAC 218.204(c) during the same day, to rely on a daily-weighted average the Permittee would need to have a site-specific proposal approved by USEPA as a SIP revision.

e. The affected line is subject to 35 IAC 212.321(a), which provides that no person shall cause or allow the emission of particulate matter (PM) into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of PM from all other similar new process emission units, at a source or premises, exceeds the allowable emission rates specified in 35 IAC 212.321(c) [35 IAC 212.321(a)].

Note: As the maximum anticipated process weight rate for the affected line is no more than 100 pounds per hour, the allowable PM emission rate for the line set by 35 IAC 212.321 is 0.55 pounds per hour.

f. The affected line is subject to 35 IAC 214.301, which provides that no person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission unit to exceed 2000 ppm [35 IAC 214.301].

1.1.4 Non-Applicability Provisions

a. This revised permit is issued based on the affected line still not being a major modification subject to 35 IAC Part 203, Major Stationary Sources Construction and Modification (MSSCAM) because the emissions of VOM from the affected line are less than 40 tons per year.

b. The affected line is not subject to 40 CFR 60 Subpart VVV, Standards of Performance for Polymeric Coating of Supporting Substrates Facilities because the affected line does not fit the definition for “polymeric coating of supporting substrates”, which excludes paper, plastic film, metallic foil or metal coil.

c. This permit is issued based on cleaning operations for the affected line not being subject to the control requirements of 35 IAC 218.187, Other Industrial Solvent Cleaning Operations, pursuant to 35 IAC 218.187(a)(2)(B)(vii), as the affected line performs paper coating.

d. The affected line is not subject to the limitations of 35 IAC 218.301 or 218.302, Use of Organic Material, because the line is subject to 35 IAC 218.204.

e. The air heater for the affected line is not subject to 35 IAC 216.121, Emissions of Carbon Monoxide from Fuel Combustion Emission Units, or 35 IAC 217.121, Emissions of Nitrogen Oxides from New Fuel Combustion Emission Sources, because the affected line does not utilize emission units that meet the definition of fuel combustion emission unit.

1.1.5 Operational Requirements And Work Practices

a. For the affected line, the Permittee shall comply with all applicable operating requirements of the NESHAP, including:

i. Operation in compliance with operating limits under the NESHAP, 40 CFR 63.3321.

ii. Compliance with the general requirements of 40 CFR 63.6(e), which contains operation and maintenance requirements including the requirement to develop and implement a written startup, shutdown and malfunction plan as specified in 40 CFR 63.6(e)(3). The startup, shutdown and malfunction plan describes, in detail, procedures for operating and maintaining paper coating lines at the source including the affected line, during periods of startup, shutdown, and malfunction, and includes a program of corrective action for malfunctioning process and air pollution control and monitoring equipment used to comply with the NESHAP standard.

b. When operating in Mode 1, the Permittee shall comply with the following operating requirements for the control of emissions for the affected line.

i. The ventilation for the affected line shall be designed and operated to qualify as a permanent total enclosure for VOM emissions.

ii. The RTO shall reduce organic HAPs emissions by at least 98 percent, pursuant to 40 CFR 63.3370.

iii. The RTO average combustion temperature in any 3-hour period must not fall below the combustion temperature limit established during the performance test in accordance with 40 CFR 63.3360(e)(3)(i).

c. i. In Mode 2, the usage of VOM in coatings shall not exceed 1.2 tons/month and 12.0 tons/year. Compliance with this annual limit and the annual limit set by Condition 1.1.6(a) shall be determined from a running average of 12 months of data.

ii. The Permittee shall only use water or exempt (i.e., non-VOM) solvents for cleanup operations.

d. The affected line is subject to the general requirements of 40 CFR 63.6(e), which contains operation and maintenance requirements including the requirement to develop and implement a written startup, shutdown and malfunction plan as specified in 40 CFR 63.6(e)(3). The startup, shutdown and malfunction plan describes, in detail, procedures for operating and maintaining paper coating lines at the source including the affected line, during periods of startup,

shutdown, and malfunction, and includes a program of corrective action for malfunctioning process and air pollution control and monitoring equipment used to comply with the NESHAP standard.

e. The air heater for the affected line shall only be fired with natural gas.

f. Pursuant to 35 IAC 218.218(a), for the affected line the Permittee shall:

i. Store all VOM-containing cleaning materials in closed containers;

ii. Ensure that mixing and storage containers used for VOM-containing materials are kept closed at all times except when depositing or removing those materials;

iii. Minimize spills of VOM-containing materials;

iv. Convey VOM-containing materials from one location to another in closed containers or pipes; and

v. Minimize VOM emissions from the cleaning of storage, mixing, and conveying equipment.

1.1.6 Operational and Emission Limits

a. When operating in Mode 1, the control system on the affected line shall achieve at least 98 percent overall control efficiency of VOM.

b. i. The total usage of coating on the affected line in Mode 1 shall not exceed 22.6 tons/month and 226 tons/year.

ii. The total amount of VOM in coatings applied on the affected line in Mode 2 shall not exceed 1.2 tons/month and 12.0 tons/year.

c. i. Emissions of VOM from the affected line, including any emissions from cleanup operations, shall not exceed 1.5 tons/month and 15.0 tons/year.

ii. Combustion emissions from the RTO shall not exceed the following limits:

A. Emissions of NO_x and CO shall each not exceed 0.4 tons/month and 1.1 tons/year.

B. Emissions of CO_2e shall not exceed 200 tons/month and 1500 tons/year.

d. Compliance with the annual limits in Conditions 1.1.6(b) and (c) shall be determined from a running average of 12 months of data.

1.1.7-1 Emission Testing Requirements

a. i. The Permittee shall comply with all applicable testing requirements in the NESHAP 40 CFR 63.3360, including testing of the efficiency of the control system.

ii. Pursuant to the 35 IAC 218.105(d), the Permittee shall also have measurements made for VOM emissions, which shall be

measured during conditions that are representative of maximum emissions. The test shall be designed to measure the destruction efficiency across the oxidizer.

iii. Upon request by the Illinois EPA, the Permittee shall also have performance tests conducted for the affected line in accordance with 40 CFR 63.3360(c) or (d) to confirm compliance with the limitations in 40 CFR 63.3320.

iv. In conjunction with emissions testing, the Permittee shall have testing performed, in accordance with 35 IAC 218.105(c)(i)(A), on the affected line enclosure to demonstrate achievement of permanent total enclosure for the affected line.

b. At least 30 days prior to the actual date of testing, a written test plan shall be submitted to the Illinois EPA for review. This plan shall describe the specific procedures for testing, including as a minimum:

i. The person(s) who will be performing sampling and analysis and their experience with similar tests.

ii. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the emission unit and any control equipment will be determined.

iii. The specific determinations of emissions and operation, which are intended to be made, including sampling and monitoring locations.

iv. The test method(s), which will be used, with the specific analysis method, if the method can be used with different analysis methods.

v. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification.

c. The Illinois EPA shall be notified prior to these tests to enable the Illinois EPA to observe these tests. Notification of the expected date of testing shall be submitted a minimum of 30 days prior to the expected date. Notification of the actual date and expected time of testing shall be submitted a minimum of 5 working days prior to the actual date of the test. The Illinois EPA may at its discretion accept notifications with shorter advance notice provided that the Illinois EPA will not accept such notifications if it interferes with the Illinois EPA's ability to observe testing.

d. Copies of the Final Report(s) for these tests shall be submitted to the Illinois EPA within 45 days after the test results are compiled and finalized. The Final Report shall include as a minimum:

i. A summary of results

ii. General information

iii. Description of test method(s), including description of sampling points, sampling train, analysis equipment, and test schedule

iv. Detailed description of test conditions, including:

A. Process information, i.e., mode(s) of operation, process rate, e.g. raw material consumption.

B. Control equipment information, i.e., equipment condition and operating parameters during testing.

v. Data and calculations, including copies of all raw data sheets and records of laboratory analyses, sample calculations, and data on equipment calibration.

1.1.7-2 Sampling and Analysis of Materials

Upon reasonable request by the Illinois EPA, the VOM and HAP content of specific coatings and cleaning solvents used on the affected line shall be determined as follows:

a. The VOM content of representative coatings “as applied” on the affected coating line shall be determined according to USEPA Reference Methods 24 and 24A of 40 CFR 60 Appendix A and the procedures of 35 IAC 218.105(a).

b. This testing may be performed by the supplier of a material provided that the supplier provides appropriate documentation for such testing to the Permittee and the Permittee’s compliance records directly reflect the application of such material and separately account for any additions of solvent.

c. Records shall be kept of these determinations that include the following:

i. The date, place and time of sampling

ii. The date(s) analyses were performed

iii. The company or entity that performed the analyses

iv. The material tested

v. The analytical techniques or methods used

vi. The results of such analyses

1.1.8 Monitoring Requirements

a. For the control system for the affected line, the Permittee shall comply with the monitoring of the NESHAP requirements, including:

i. Pursuant to 40 CFR 63.3350(e), the oxidizer shall be equipped with continuous monitoring device(s) which are installed, calibrated, operated and maintained according to vendor specifications at all times the oxidizer is in use. The monitoring device(s) shall monitor the temperature before and after the catalyst bed, and record this information along with the temperature rise across the bed.

ii. Pursuant to 40 CFR 63.3350(f), monitoring requirements for the capture system.

b. The Permittee shall comply with all applicable monitoring requirements of 35 IAC 218.105(d).

1.1.9 Recordkeeping Requirements

a. For the affected line, the Permittee shall fulfill all applicable recordkeeping requirements in the NESHAP 40 CFR 63.3410.

b. i. For the affected line, the Permittee shall fulfill applicable recordkeeping requirements of 35 IAC 218.211(c)(2), (d)(2) or (e)(2), depending on the approach to compliance with 35 IAC Part 218 Subpart F, i.e., compliant coatings, compliant coatings with daily-weighted average, or use of add-on control equipment.

ii. The Permittee shall maintain records as necessary to support the records required by 35 IAC 218.211(c)(2), (d)(2) or (e)(2), as appropriate, including records identifying the limitation and rule by which the affected line is complying each day.

c. For operation in Mode 1, the Permittee shall keep the following records:

i. The amount of coatings used (tons/month and tons year), by type and total.

ii. VOM content of the coatings used in the affected line, percent by weight, by type of coating, with supporting documentation.

iii. VOM emissions (tons/month and tons/year), with supporting calculations.

d. For operation in Mode 2, the Permittee shall keep the following records:

i. The amount of coatings used (tons/month and tons year), by type and total.

ii. VOM content of the coatings used in the affected line, percent by weight, by type of coating, with supporting documentation.

iii. VOM emissions (tons/month and tons/year), with supporting calculations.

e. The Permittee shall keep records of the total VOM emissions of the affected line (tons/month and tons/year), with supporting data and calculations.

1.1.10 Reporting Requirements

a. The Permittee shall fulfill applicable notification and reporting requirements under the Subpart JJJJ NESHAP, 40 CFR 63.3400.

b. i. For the affected line, the Permittee shall fulfill applicable reporting requirements of 35 IAC 218.211(c), (d) and (e).

ii. For this purpose, the Permittee shall submit a certification of compliance for initial operation in Modes 1 and 2.

c. The Permittee shall promptly notify the Illinois EPA of deviations of the affected line with the permit requirements as follows. At a minimum, reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

i. Deviations from the NESHAP shall be reported in the semi-annual compliance reports required by the NESHAP.

ii. Violations of 35 IAC 218.207 shall be reported in 30 days in accordance with 35 IAC 218.211(e).

iii. Any other deviations shall be reported in a quarterly report.

1.1.11 The Permittee is allowed to operate the affected line under this construction permit until the next reissuance of the CAAPP Permit.

1.1.12 The Permittee is allowed to operate the affected line with an additional coating station and increased throughput and emissions under this construction permit until the next reissuance of the CAAPP permit. This supersedes Standard Condition 6.

Section 8 – State Only Requirements

1. Permitted Emissions for Fees

The annual emissions from the source for purposes of "Duties to Pay Fees" of Condition 2.3(e), not considering insignificant activities as addressed by Section 6, shall not exceed the following limitations. The overall source emissions shall be determined by adding emissions from all emission units. Compliance with these limits shall be determined on a calendar year basis. The Permittee shall maintain records with supporting calculations of how the annual emissions for fee purposes were calculated. This Condition is set for the purpose of establishing fees and is not federally enforceable. See Section 39.5(18) of the Act.

Pollutant		*Tons/Year*
Volatile Organic Material	(VOM)	100.45
Sulfur Dioxide	(SO_2)	0.15
Particulate Matter	(PM)	1.86
Nitrogen Oxides	(NO_x)	24.5
HAP, not included in VOM or PM	(HAP)	–
Total		126.96

Attachment 1 – List of Emission Units at This Source

Section	*Emission Units*	*Description*
4.1	Printing Line #1	Sheet-fed non-heatset offset lithographic printing line used to print on unpainted sheets of paper.
4.1	Printing Line #2	Sheet-fed non-heatset offset lithographic printing line used to print on unpainted sheets of paper.
4.2	Printing Line #4	Flexographic printing is performed on rolls of web from 6 to 16 inches in width. Either an alcohol-based ink or UV based ink is utilized.
4.2	Printing Line #5	Flexographic printing is performed on rolls of web from 6 to 16 inches in width. Either an alcohol-based ink or UV based ink is utilized.
4.3	Coating Line #1	Coating line applies latex and/or lacquer coating to paper and film substrate in the production of color boards.
4.3	Spray Coating Line SL-1	Coating line applies latex and/or lacquer coating to paper and film substrate in the production of color boards with Catalytic Oxidizer.
4.3	Coating Line #3	Coating line applies latex and/or lacquer coating to paper and film substrate in the production of color boards with Catalytic Oxidizer.
4.3	Coating Line #4	Coating line applies latex and/or lacquer coating to paper and film substrate in the production of color boards.
4.4	Lacquer Color Matching Operations	Thousands of different colors are formulated to match customer's needs during a year. This process includes both computer and manual matching of colors and often involves 10 to 25 iterations of adding color pigments to arrive at the exact color match. The thinning of lacquer is generally done in color matching as the proper viscosity has an important bearing on the correct color. Color matching of latex paints is not included in this operation.
4.5	Boiler #1 (4.5 mmBTU/hr)	Natural gas-fired boilers are used to produce steam and comfort heating at this source.
4.5	Boiler #2 (4.5 mmBTU/hr)	Natural gas-fired boilers are used to produce steam and comfort heating at this source.
4.5	Boiler #4 (9.2 mmBTU/hr)	Natural gas-fired boilers are used to produce steam and comfort heating at this source.
4.5	Boiler #5 (11.7 mmBTU/hr)	Natural gas-fired boilers are used to produce steam and comfort heating at this source.

Attachment 2 - Acronyms and Abbreviations

acfm	Actual cubic feet per minute
ACMA	Alternative Compliance Market Account
Act	Illinois Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711
ATU	Allotment trading unit
BACT	Best Available Control Technology
BAT	Best Available Technology
BTU	British Thermal Units
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CAIR	Clean Air Interstate Rule
CAM	Compliance Assurance Monitoring
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
CISWI	Commercial Industrial Solid Waste Incinerator
CO	Carbon monoxide
CO_2	Carbon dioxide
COMS	Continuous Opacity Monitoring System
CPMS	Continuous Parameter Monitoring System
dscf	Dry standard cubic foot
dscm	Dry standard cubic meter
EAF	Electric arc furnace
ERMS	Emissions Reduction Market System
^{o}F	Degrees Fahrenheit
GHG	Green house gas
gr	Grains
HAP	Hazardous air pollutant
Hg	Mercury
HMIWI	Hospital medical infectious waste incinerator
HP	Horsepower
hr	Hour
H_2S	Hydrogen sulfide
I.D. No.	Identification number of source, assigned by IEPA
IAC	Illinois Administrative Code
ILCS	Illinois Compiled Statutes
IEPA	Illinois Environmental Protection Agency
KW	Kilowatts
LAER	Lowest Achievable Emission Rate
lb	Pound

m	Meter
MACT	Maximum Achievable Control Technology
mm	Million
mon	Month
MSDS	Material Safety Data Sheet
MSSCAM	Major Stationary Sources Construction and Modification (Non-attainment New Source Review)
MW	Megawatts
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO_x	Nitrogen oxides
NSPS	New Source Performance Standards
NSR	New Source Review
PM	Particulate matter
PM_{10}	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods
$PM_{2.5}$	Particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 microns as measured by applicable test or monitoring methods
ppm	Parts per million
ppmv	Parts per million by volume
PSD	Prevention of Significant Deterioration
PSEU	Pollutant-Specific Emission Unit
psia	Pounds per square inch absolute
PTE	Potential to emit
RACT	Reasonable Available Control Technology
RMP	Risk Management Plan
scf	Standard cubic feet
SCR	Selective catalytic reduction
SIP	State Implementation Plan
SO_2	Sulfur dioxide
T1	Title I - identifies Title I conditions that have been carried over from an existing permit
T1N	Title I New - identifies Title I conditions that are being established in this permit
T1R	Title I Revised - identifies Title I conditions that have been carried over from an existing permit and subsequently revised in this permit
USEPA	United States Environmental Protection Agency
VOM	Volatile organic material

Attachment 3 – Contact and Reporting Addresses

IEPA Compliance Section	Illinois EPA, Bureau of Air Compliance & Enforcement Section (MC 40) 1021 North Grand Avenue East P.O. Box 19276 Springfield, IL 62794-9276 Phone No.: 217/782-2113
IEPA Stack Test Specialist	Illinois EPA, Bureau of Air Compliance Section Source Monitoring – Third Floor 9511 Harrison Street Des Plaines, IL 60016 Phone No.: 847/294-4000
IEPA Air Quality Planning Section	Illinois EPA, Bureau of Air Air Quality Planning Section (MC 39) 1021 North Grand Avenue East P.O. Box 19276 Springfield, IL 62794-9276 Phone No.: 217/782-2113
IEPA Air Regional Field Operations Regional Office #1	Illinois EPA, Bureau of Air Regional Office #1 9511 Harrison Street Des Plaines, IL 60016 Phone No.: 847/294-4000
IEPA Permit Section	Illinois EPA, Bureau of Air Permit Section (MC 11) 1021 North Grand Avenue East P.O. Box 19506 Springfield, IL 62794-9506 Phone No.: 217/785-1705
USEPA Region 5 – Air Branch	USEPA (AR – 17J) Air and Radiation Division 77 West Jackson Boulevard Chicago, IL 60604 Phone No.: 312/353-2000

Attachment 4 – Example Certification by a Responsible Official

SIGNATURE BLOCK
NOTE: THIS CERTIFICATION MUST BE SIGNED BY A RESPONSIBLE OFFICIAL. APPLICATIONS WITHOUT A SIGNED CERTIFICATION WILL BE DEEMED AS INCOMPLETE.
I CERTIFY UNDER PENALTY OF LAW THAT, BASED ON INFORMATION AND BELIEF FORMED AFTER REASONABLE INQUIRY, THE STATEMENTS AND INFORMATION CONTAINED IN THIS APPLICATION ARE TRUE, ACCURATE AND COMPLETE. ANY PERSON WHO KNOWINGLY MAKES A FALSE, FICTITIOUS, OR FRAUDULENT MATERIAL STATEMENT, ORALLY OR IN WRITING, TO THE ILLINOIS EPA COMMITS A CLASS 4 FELONY. A SECOND OR SUBSEQUENT OFFENSE AFTER CONVICTION IS A CLASS 3 FELONY. (415 ILCS 5/44(H)) AUTHORIZED SIGNATURE: BY: _____ _____ AUTHORIZED SIGNATURE TITLE OF SIGNATORY _____ _____ / _____ / _____ TYPED OR PRINTED NAME OF SIGNATORY DATE